

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**No. CR\_\_-\_\_\_\_RB**

\_\_\_\_\_,

**Defendant[s].**

**[United States’/Defendant’s] PROPOSED JURY INSTRUCTIONS**

**PRAECIPE**

<b>Judge Brack’s Criminal Stock Instruction</b>	<b>Parties Accept / Do Not Accept</b>	<b>Proposed Alternative (note page in Memorandum with argument &amp; source authority)</b>	<b>Is proposed alternative contested? (if so, detail objections in accompanying Memorandum)</b>
<p><b>A. Preliminary Jury Instruction</b> 10th Cir. Pattern Jury Instructions (PJI) (Criminal) § 1.01 (2021) [modified]; and § 1.02 5th Cir. Pattern Criminal Jury Instructions § 1.01 (2019) [modified] Proposed Model Jury Instruction – The Use of Electronic Technology to Learn or Communicate about a Case, Judicial Conference Committee on Court administration and Case Management (updated June 2020)</p>			
<p><b>1. Introduction to Final Instructions</b> 10th Cir. PJI (Criminal) § 1.03 (2021)</p>			

<p><b>2. Duty to Follow Instructions</b> 10th Cir. PJI Criminal) § 1.04 (2021)</p>			
<p><b>3. Presumption of Innocence - Burden of Proof - Reasonable Doubt</b> 10th Cir. PJI (Criminal) § 1.05 (2021)</p>			
<p><b>4. Evidence - Defined</b> 10th Cir. PATTERN JURY INSTRUCTIONS (Criminal) § 1.06 (2021)</p>			
<p><b>5. Evidence - Direct and Circumstantial - Inferences</b> 10th Cir. PATTERN JURY INSTRUCTIONS (Criminal) § 1.07 (2021)</p>			
<p><b>6. Credibility of Witnesses &amp; Non-Testifying Defendant</b> 10th Cir. PJI (Criminal) § 1.08 (2021); and § 1.08.1 (2021)</p>			
<p><b>7. Impeachment by Prior Inconsistencies</b> 10th Cir. PJI (Criminal) § 1.10 (2021)</p>			
<p><b>8. On or About</b> 10th Cir. PJI (Criminal) § 1.18 (2021)</p>			
<p><b>9. Caution - Consider Only Crime Charged</b> 10th Cir. PJI (Criminal) § 1.19 (2021)</p>			
<p><b>10. Caution - Punishment</b> 10th Cir. PJI (Criminal) § 1.20 (2021)</p>			
<p><b>11. Duty to Deliberate</b> 10th Cir. PJI (Criminal) § 1.23 (2021) Proposed Model Jury Instruction – The Use of Electronic Technology to Learn or Communicate about a Case, Judicial Conference Committee on Court administration and Case Management (updated June 2020)</p>			

<b>FORM OF VERDICT</b> Governed by indictment at issue. Parties must submit a form of verdict in the format provided.			
<b>Additional Proposed Instructions          (Label as “Govt.’s Proposed”, “Def.’s Proposed”, or “Joint Proposed”)</b>	<b>Note page in Memorandum          with argument &amp;          source/authority.</b>	<b>Objections? (detail in          Memorandum)</b>	