

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. ____ – CR-____-SMD

_____,

Defendant[s].

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

PRAECIPE

Judge Davenport’s Criminal Stock Instruction	Parties Accept / Do Not Accept	Proposed Alternative (note page in Memorandum with argument & source authority)	Is proposed alternative contested? (if so, detail objections in accompanying Memorandum)
A. Preliminary Jury Instruction 10th Cir. Pattern Jury Instructions (PJI) (Criminal) § 1.01 (2025) and § 1.02(B) (2025). 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)			
1. Introduction to Final Instructions 10th Cir. PJI (Criminal) § 1.03 (2025)			

2. Duty to Follow Instructions 10th Cir. PJI Criminal) § 1.04 (2025)			
3. Presumption of Innocence - Burden of Proof - Reasonable Doubt 10th Cir. PJI (Criminal) § 1.05 (2025)			
4. Evidence - Defined 10th Cir. PATTERN JURY INSTRUCTIONS (Criminal) § 1.06 (2025)			
5. Evidence - Direct and Circumstantial - Inferences 10th Cir. PATTERN JURY INSTRUCTIONS (Criminal) § 1.07 (2025)			
6. Credibility of Witnesses & Non-Testifying Defendant 10th Cir. PJI (Criminal) § 1.08 (2025); and § 1.08.1 (2025)			
7. Impeachment by Prior Inconsistencies 10th Cir. PJI (Criminal) § 1.10 (2025)			
8. On or About 10th Cir. PJI (Criminal) § 1.18 (2025)			
9. Caution - Consider Only Crime Charged 10th Cir. PJI (Criminal) § 1.19 (2025)			
10. Caution - Punishment 10th Cir. PJI (Criminal) § 1.20 (2025)			
11. Duty to Deliberate 10th Cir. PJI (Criminal) § 1.23 (2025) 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)			

