

JUDGE PARKER'S STANDARD CRIMINAL JURY INSTRUCTIONS WORK SHEET

- If the entry is in SMALL CAPS, 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. ___ (a witness has a felony conviction & deft testifies without a felony conviction) (use with "A") Cr.17e
- F. ___ (a witness has a 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 deftts & multiple counts) Cr.25d

_____ DUTY TO DELIBERATE

Cr.26

_____ EXPLANATION OF VERDICT FORM(S)

- A. ___ (single verdict form) Cr.27a
- B. ___ (multiple verdict forms) Cr.27b

_____ VERDICT FORMS(S) *

V. OTHER INSTRUCTIONS

_____ “STIPULATION” DEFINITION

Cr.101