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8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF ARIZONA

8 UNITED STATES OF AMERICA,]
 9 Plaintiff,] No. CR-06-0945-TUC-CKJ(BPV)
 10 vs.] DEFENDANT'S REQUESTED
 11] JURY INSTRUCTIONS
 12 ALEJANDRO LOPEZ,]
 13 Defendant.]

14 Pursuant to Rule 30, Fed.R.Crim.Pro., defendant hereby
 15 requests the Court give the attached jury instructions in the
 16 trial of the above-captioned case.

17 Respectfully submitted April 5, 2007.

18 /s/ Leslie A. Bowman
 19 Leslie A. Bowman
 20 Attorney for Defendant

21 Copy delivered by
 ECF this date to:
 22 Tara C. Neda
 AUSA
 23 Richard S. Madril
 24 Counsel for Co-Defendant Orantez
 25 Natalie Hubbs Haywood
 26 Counsel for Co-Defendant Madueño

STANDARD INSTRUCTIONS

Defendant requests the following standard instructions from the Ninth Circuit Manual of Model Jury Instructions, Criminal, 2000 Edition, be read and/or provided in an instruction packet to the jurors:

- 1.1 Duty of Jury
- 1.2 The Charge - Presumption of Innocence
- 1.3 What is Evidence
- 1.4 What is not Evidence
- 1.5 Evidence for Limited Purpose
- 1.6 Direct and Circumstantial Evidence
- 1.7 Ruling on Objections
- 1.8 Credibility of Witnesses
- 1.9 Conduct of the Jury
- 1.10 No Transcript Available to Jury
- 1.11 Taking Notes
- 1.12 Outline of Trial
- 1.14 Separate Consideration for Each Defendant
- 2.1 Cautionary Instruction - First Recess
- 2.2 Bench Conferences and Recesses
- 2.4 Stipulations of Fact
- 2.10 Other Crimes, Wrongs or Acts of Defendant
- 3.1 Duties of Jury to Find Facts and Follow Law
- 3.2 Charge Against Defendant Not Evidence -
Presumption of Innocence - Burden of Proof
- 3.3 Defendant's Decision Not to Testify (as

1		needed)
2	3.4	Defendant's Decision to Testify (as needed)
3	3.5	Reasonable Doubt - Defined
4	3.6	What is Evidence
5	3.7	What is Not Evidence
6	3.8	Direct and Circumstantial Evidence
7	3.9	Credibility of Witnesses
8	3.10	Evidence of Other Acts of the Defendant or
9		Acts and Statements of Others
10	3.11	Activities Not Charged
11	3.14	Separate Consideration of Multiple Counts -
12		Multiple Defendants
13	3.15	Lesser Included Offense
14	4.3	Other Crimes, Wrongs or Acts of Defendant
15	4.17	Opinion Evidence, Expert Witness
16	4.19	Charts and Summaries in Evidence
17	5.6	Knowingly - Defined
18	6.9	Mere Presence
19	7.1	Duty to Deliberate
20	7.2	Consideration of Evidence
21	7.3	Use of Notes
22	7.4	Jury Consideration of Punishment
23	7.5	Verdict Form
24	7.6	Communication with Court
25	8.16	Conspiracy-Elements

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**4.9 Testimony of Witness Involving Special Circumstances -
Benefits, Accomplice, Plea**

You have heard testimony from Melena Escarcega Arredondo, a witness who

1. Received favored treatment from the government in connection with this case;
2. Admitted being an accomplice to the crime charged. An accomplice is one who voluntarily and intentionally joins with another person in committing a crime;
3. Pleaded guilty to a crime arising out of the same events for which the defendants are on trial. This guilty plea is not evidence against the defendants, and you may consider it only in determining this witness's believability.

For these reasons, in evaluating Melena Escarcega Arredondo's testimony, you should consider the extent to which or whether her testimony may have been influenced by any of these factors. In addition, you should examine Melena Escarcega Arredondo's testimony with greater caution than that of other witnesses.