

1 Sheila Sullivan Polk
Yavapai County Attorney
2 By Ethan A. Wolfinger (#006598)
Deputy County Attorney
3 2830 N. Commonwealth Drive Suite 106
4 Camp Verde, AZ 86322
928-567-7717

5 Attorney for STATE OF ARIZONA

6
7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF YAVAPAI**

9 **STATE OF ARIZONA,**

10
11 Plaintiff,

12 v.

13 **ANTHONY JAMES RICHARDS,**

14 Defendant.

CAUSE NO. P1300CR201600476

Division 7

**STATE'S REQUESTED JURY
INSTRUCTIONS**

15
16 The State of Arizona, by and through Sheila Sullivan Polk, Yavapai County Attorney, and
17 her deputy undersigned, hereby respectfully requests the following R.A.J.I. (5th ed) jury
18 instructions.

19 Respectfully submitted this 1st day of February, 2022.

20
21 SHEILA SULLIVAN POLK
YAVAPAI COUNTY ATTORNEY

22 By 

23 Ethan A. Wolfinger
Deputy County Attorney

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25 COPY of the foregoing emailed this
1st day of February, 2022, to:

26 Tyrone Mitchell
Attorney for Defendant



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R.A.J.I. (5th Edition 2019) STANDARD CRIMINAL JURY INSTRUCTIONS:

- 1 - Duty of Jury
- 2 - Indictment/Information Is Not Evidence
- 3 - Presumption of Innocence
- 4(a) - Burden of Proof
- 5 - Jury Not to Consider Penalty
- 8 - Evidence to Be Considered
- 10 - Lawyers Comments are Not Evidence
- 11 - Stipulations (if applicable)
- 13 - Redacted Exhibits (if applicable)
- 14 - Direct and Circumstantial Evidence
- 15 - Credibility/Believability of Witnesses
- 16 - Testimony of Law Enforcement Officers
- 17 - Expert Witness
- 18(a) - Defendant Need Not Testify
- 19 - Voluntariness of Defendant’s Statements
- 21 - Defendant Witness (Prior Conviction)
- 28 - Absence of Other Participant
- 30 - Separate Counts
- 35 - Voluntary Act
- 40 - Flight or Concealment
- 44 - Motive
- 46 - Alibi or non-presence of defendant

R.A.J.I. STATUTORY CRIMINAL JURY INSTRUCTIONS

- 1.0510(a)(1) - Definition of intentionally**
- 1.051(a)(2) - Intent Inference**
- 1.0510(b) - Definition of ‘Knowingly’**
- 1.0510(c) - Definition of ‘Recklessly’**
- 1.0535 - Definition of ‘Possess’ or ‘Possession’**

R.A.J.I. INSTRUCTIONS APPLICABLE TO CRIMES CHARGED

COUNT 1 - First Degree Murder

11.08
- with definition of premeditated

COUNT 2 - Trafficking in Stolen Property in the First Degree

23.07.02
Definition of Traffic (23.07.02)
Definition of Stolen Property (23.07.02)

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Definition of Property (23.07.02)

Definition of ‘Property of Another’ (23.07.02)

Definition of ‘Control’ or ‘Exercise Control (23.07.02)

Count 3 - Theft (DISMISSED BY STATE)

Count 4 - Theft of Credit Card

21.02 [controlling credit card without cardholder’s consent]

21.01.02 - Definition of ‘Cardholder.’

21.01.03 - Definition of ‘credit card’

Counts 5 - 18; 20 - 24 - Taking the Identity of Another

20.08(A) - (Took/Taking Identity of Another Person – Credit Card

Count 19 - Forgery

20.02 - (made, completed or altered a written instrument)

Definition of written instrument

Definition of forged instrument

Definition of Falsely completes a written instrument