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SUPERIOR COURT
 YAVAPAI COUNTY, ARIZONA

2020 FEB 26 PM 4:32 ✓

DONNA McQUALITY, CLERK

BY: T. MAINEZ

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

STATE OF ARIZONA,)	P1300CR201600476
)	
Plaintiff,)	
)	
vs.)	JURY INSTRUCTIONS
)	
ANTHONY RICHARDS,)	
)	
Defendant.)	(Hon. Tina Ainley)
)	
_____)	

The Defendant hereby Requests the following Jury Instructions:

R.A.J.I. (Revised Arizona Jury Instructions) Criminal, 5th (2019), Standard Criminal

Instructions:

2, 3, 4(a)(b), 8, 9, 10, 11, 12, 13, 15, 16, 17, 18(a), 19, 21, 26 (Character and Reputation of the Defendant), 29 (Consider Evidence Separately), 30 (Separate Counts), 35, 36 (Lesser-Included Offense), 42 (Lost, Destroyed, or Unpreserved Evidence), 44 (Motive), 45 (Identification), 46 (Alibi or Non-Presence of the Defendant), 47 Third-Party Culpability.

Statutory:

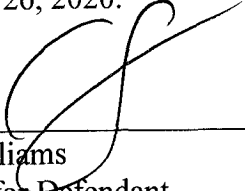
- 1) Intentionally or With Intent To Defined by Statutory Criminal 1.0510(a)(1) and (2)
- 2) Knowingly Defined by Statutory Criminal 1.0510(b)
- 3) Recklessly or Reckless Disregard Defined by Statutory Criminal 1.0510(c)

Requested Criminal Jury Instruction:

- 1) Third Party Culpability (attached).

The Defendant reserves the right to modify this list.

RESPECTFULLY SUBMITTED this February 26, 2020.



Craig Williams
Attorney for Defendant

Copies of the foregoing delivered this date to:
Hon. Tina Ainley, Judge of the Superior Court
Josh Fisher, Yavapai County Attorney's Office

By: _____



THIRD PARTY CULPABILITY:

You have heard evidence that a person other than the defendant had the opportunity and motive to commit the offense with which the defendant is charged. The defendant is not required to prove the third party's guilt.

It is the prosecution that has the burden of proving the defendant guilty beyond a reasonable doubt. Therefore, the defendant is entitled to an acquittal if you have a reasonable doubt as to the defendant's guilt. Evidence that a third party may have committed the charged offense may by itself leave you with such a reasonable doubt.

If after considering all of the evidence, including any evidence that another person committed the offense, you have a reasonable doubt that the defendant committed the offense, you must find the defendant not guilty