

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

25CR00637

JUAN ESPINOZA MARTINEZ,

Defendant.

DEFENDANT'S PROPOSED JURY INSTRUCTIONS

Now comes the Defendant, Juan Espinoza Martinez, by and through his attorney, Bedi & Singer, LLP, and proposes the following jury instructions¹:

1.03 PRESUMPTION OF INNOCENCE/BURDEN OF PROOF

The defendant is presumed innocent of the charge. This presumption continues throughout the case, including during your deliberations. It is not overcome unless, from all the evidence in the case, you are convinced beyond a reasonable doubt that the defendant is guilty as charged. The government has the burden of proving the defendant's guilt beyond a reasonable doubt. This burden of proof stays with the government throughout the case.

A defendant is never required to prove his innocence. He is not required to produce any evidence at all.

3.05 WITNESSES REQUIRING SPECIAL CAUTION

You have heard testimony from a witness who has received or expected a benefit in return for his cooperation with the government. You may give this witness' testimony

¹ The defense reserves the right to propose additional jury instructions as the trial unfolds.

whatever weight you believe is appropriate, keeping in mind that you must consider that testimony with caution and great care.

Respectfully submitted,

s/ Jonathan S. Bedi

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that the foregoing document was filed via the Court's ECF system.

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