

1 BILAL A. ESSAYLI
2 Acting United States Attorney
3 JOSEPH T. MCNALLY
4 Assistant United States Attorney
5 Acting Chief, Criminal Division
6 JEHAN PERNAS KIM (Cal. Bar No. 320584)
7 Assistant United States Attorney
8 Deputy Chief, Transnational Organized
9 Crime Section
10 PATRICK D. KIBBE (Cal. Bar No. Pending)
11 Assistant United States Attorney
12 General Crimes Section
13 1200 United States Courthouse
14 312 North Spring Street
15 Los Angeles, California 90012
16 Telephone: (714) 338-3549/ (213) 894-6482
17 Facsimile: (213) 894-0141
18 Email: jehan.kim@usdoj.gov
19 patrick.kibbe@usdoj.gov

20
21 Attorneys for Plaintiff
22 UNITED STATES OF AMERICA

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24 UNITED STATES DISTRICT COURT

25 FOR THE CENTRAL DISTRICT OF CALIFORNIA

26 UNITED STATES OF AMERICA,

27 No. CR 2:25-501-SVW

28 Plaintiff,

JOINT PROPOSED JURY INSTRUCTIONS

v.

Trial Date: September 16, 2025

BRAYAN RAMOS-BRITO,

Trial Time: 9:00 a.m.

Defendant.

Location: Courtroom of the
Hon. Steven V. Wilson

21 Plaintiff United States of America, by and through its counsel
22 of record, the Acting United States Attorney for the Central
23 District of California and Assistant United States Attorneys Patrick
24 D. Kibbe and Jehan Pernas Kim, and defendant BRAYAN RAMOS-BRITO, by
25 and through his counsel of record, Deputy Federal Public Defender Bo
26 Griffith and Federal Public Defender Cuauhtemoc Ortega hereby submit
27 Joint Proposed Jury Instructions in the above-captioned case. The
28

1 parties respectfully reserve the right to supplement these jury
2 instructions as needed.

3 Unless otherwise noted, the parties have used the most recent
4 version of the Jury Instructions found on the Ninth Circuit's
5 website at: <http://www3.ce9.uscourts.gov/jury-instructions/model-criminal>.

6
7 Dated: September 8, 2025 Respectfully submitted,

8
9 BILAL A. ESSAYLI
Acting United States Attorney

10 JOSEPH T. McNALLY
Assistant United States Attorney
11 Acting Chief, Criminal Division

12 /s/
13 JEHAN PERNAS KIM
PATRICK D. KIBBE
14 Assistant United States Attorneys

15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA

17
18 Dated: September 8, 2025

/s/ per email authorization
19 BO GRIFFITH
CUAUHTEMOC ORTEGA
20 Deputy Federal Public Defender and
Federal Public Defender

21 Attorneys for Defendant
22 BRAYAN RAMOS-BRITO

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1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 1

3 At the End of Each Day of the Case:

4 As I indicated before this trial started, you as jurors will
5 decide this case based solely on the evidence presented in this
6 courtroom. This means that, after you leave here for the night, you
7 must not conduct any independent research about this case, the
8 matters in the case, the legal issues in the case, or the
9 individuals or other entities involved in the case. This is
10 important for the same reasons that jurors have long been instructed
11 to limit their exposure to traditional forms of media information
12 such as television and newspapers. You also must not communicate
13 with anyone, in any way, about this case. And you must ignore any
14 information about the case that you might see while browsing the
15 internet or your social media feeds.

16

17 At the Beginning of Each Day of the Case:

18 As I reminded you yesterday and continue to emphasize to you
19 today, it is important that you decide this case based solely on the
20 evidence and the law presented here. So you must not learn any
21 additional information about the case from sources outside the
22 courtroom. To ensure fairness to all parties in this trial, I will
23 now ask each of you whether you have learned about or shared any
24 information about this case outside of this courtroom, even if it
25 was accidental.

26

27 [ALTERNATIVE 1 (in open court): if you think that you might

28 have done so, please let me know now by raising your hand. [Wait for

1 a show of hands]. I see no raised hands; however, if you would
2 prefer to talk to the court privately in response to this question,
3 please notify a member of the court's staff at the next break.
4 Thank you for your careful adherence to my instructions.]

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6 [ALTERNATIVE 2 (during voir dire with each juror,
7 individually): Have you learned about or shared any information
8 about this case outside of this courtroom? . . . Thank you for your
9 careful adherence to my instructions.]

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27 Ninth Circuit Model Criminal Jury Instructions, No. 2.1 (2022 ed.)
28 [Cautionary Instruction]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 2

3 You are about to hear a recording that has been received in
4 evidence. Please listen to it very carefully. Each of you has been
5 given a transcript of the recording to help you identify speakers
6 and as a guide to help you listen to the recording. However, bear
7 in mind that the recording is the evidence, not the transcript. If
8 you hear something different from what appears in the transcript,
9 what you hear is controlling. After the recording has been played,
10 the transcript will be taken from you.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 2.6 (2022 ed.)

28 [Transcript of Recording in English]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 3

3 Members of the jury, now that you have heard all the evidence,
4 it is my duty to instruct you on the law that applies to this case.
5 A copy of these instructions will be available in the jury room for
6 you to consult.

7 It is your duty to weigh and to evaluate all the evidence
8 received in the case and, in that process, to decide the facts. It
9 is also your duty to apply the law as I give it to you to the facts
10 as you find them, whether you agree with the law or not. You must
11 decide the case solely on the evidence and the law. Do not allow
12 personal likes or dislikes, sympathy, prejudice, fear, or public
13 opinion to influence you. You should also not be influenced by any
14 person's race, color, religious beliefs, national ancestry, sexual
15 orientation, gender identity, gender, or economic circumstances.
16 Also, do not allow yourself to be influenced by personal likes or
17 dislikes, sympathy, prejudice, fear, public opinion, or biases,
18 including unconscious biases. Unconscious biases are stereotypes,
19 attitudes, or preferences that people may consciously reject but may
20 be expressed without conscious awareness, control, or intention.
21 You will recall that you took an oath promising to do so at the
22 beginning of the case.

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1 You must follow all these instructions and not single out some
2 and ignore others; they are all important. Please do not read into
3 these instructions, or into anything I may have said or done, any
4 suggestion as to what verdict you should return -- that is a matter
5 entirely up to you.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.1 (2022 ed.)

28 [Duties of the Jury to Find Facts and Follow Law]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 4

3 The information is not evidence. The defendant has pleaded not
4 guilty to the charge. The defendant is presumed to be innocent
5 unless and until the government proves the defendant guilty beyond a
6 reasonable doubt. In addition, the defendant does not have to
7 testify or present any evidence. The defendant does not have to
8 prove innocence; the government has the burden of proving every
9 element of the charge beyond a reasonable doubt.

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Ninth Circuit Model Criminal Jury Instructions, No. 6.2 (2022 ed.)
[Charge Against Defendant Not Evidence -- Presumption of
Innocence -- Burden of Proof] (modified to reflect information)

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 5

3 [If defendant does not testify]

4 A defendant in a criminal case has a constitutional right not
5 to testify. You may not draw any inference of any kind from the
6 fact that the defendant did not testify.

7
8 [If defendant testifies]

9 The defendant has testified. You should treat this testimony
10 just as you would the testimony of any other witness.

27 Ninth Circuit Model Criminal Jury Instructions, Nos. 6.3 and 6.4
28 (2022 ed.) [Defendant's Decision Not To Testify/To Testify]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 6

3 Proof beyond a reasonable doubt is proof that leaves you firmly
4 convinced the defendant is guilty. It is not required that the
5 government prove guilt beyond all possible doubt.

6 A reasonable doubt is a doubt based upon reason and common
7 sense and is not based purely on speculation. It may arise from a
8 careful and impartial consideration of all the evidence, or from
9 lack of evidence.

10 If after a careful and impartial consideration of all the
11 evidence, you are not convinced beyond a reasonable doubt that the
12 defendant is guilty, it is your duty to find the defendant not
13 guilty. On the other hand, if after a careful and impartial
14 consideration of all the evidence, you are convinced beyond a
15 reasonable doubt that the defendant is guilty, it is your duty to
16 find the defendant guilty.

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 7

3 The evidence you are to consider in deciding what the facts are
4 consists of:

5 (1) the sworn testimony of any witness;
6 (2) the exhibits received in evidence; and
7 (3) any facts to which the parties have agreed.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.6 (2022 ed.)

28 [What Is Evidence]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 8

3 In reaching your verdict you may consider only the testimony
4 and exhibits received in evidence. The following things are not
5 evidence and you may not consider them in deciding what the facts
6 are:

7 1. Questions, statements, objections, and arguments by the
8 lawyers are not evidence. The lawyers are not witnesses. Although
9 you must consider a lawyer's questions to understand the answers of
10 a witness, the lawyer's questions are not evidence. Similarly, what
11 the lawyers have said in their opening statements, closing
12 arguments, and at other times is intended to help you interpret the
13 evidence, but it is not evidence. If the facts as you remember them
14 differ from the way the lawyers state them, your memory of them
15 controls.

16 2. Any testimony that I have excluded, stricken, or instructed
17 you to disregard is not evidence. [In addition, some evidence was
18 received only for a limited purpose; when I have instructed you to
19 consider certain evidence in a limited way, you must do so.]

20 3. Anything you may have seen or heard when the court was not
21 in session is not evidence. You are to decide the case solely on
22 the evidence received at the trial.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.7 (2022 ed.)
28 [What Is Not Evidence]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION No. 9

3 Evidence may be direct or circumstantial. Direct evidence is
4 direct proof of a fact, such as testimony by a witness about what
5 that witness personally saw or heard or did. Circumstantial
6 evidence is indirect evidence, that is, it is proof of one or more
7 facts from which you can find another fact.

8 You are to consider both direct and circumstantial evidence.
9 Either can be used to prove any fact. The law makes no distinction
10 between the weight to be given to either direct or circumstantial
11 evidence. It is for you to decide how much weight to give to any
12 evidence.

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19 Ninth Circuit Model Criminal Jury Instructions, No. 6.8 (2022 ed.)
20 [Direct and Circumstantial Evidence]

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1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 10

3 In deciding the facts in this case, you may have to decide
4 which testimony to believe and which testimony not to believe. You
5 may believe everything a witness says, or part of it, or none of it.

6 In considering the testimony of any witness, you may take into
7 account the following:

8 (1) the witness's opportunity and ability to see or hear or
9 know the things testified to;

10 (2) the witness's memory;

11 (3) the witness's manner while testifying;

12 (4) the witness's interest in the outcome of the case, if any;

13 (5) the witness's bias or prejudice, if any;

14 (6) whether other evidence contradicted the witness's
15 testimony;

16 (7) the reasonableness of the witness's testimony in light of
17 all the evidence; and

18 (8) any other factors that bear on believability.

19 Sometimes a witness may say something that is not consistent
20 with something else he or she said. Sometimes different witnesses
21 will give different versions of what happened. People often forget
22 things or make mistakes in what they remember. Also, two people may
23 see the same event but remember it differently. You may consider
24 these differences, but do not decide that testimony is untrue just
25 because it differs from other testimony.

26 However, if you decide that a witness has deliberately
27 testified untruthfully about something important, you may choose not
28 to believe anything that witness said. On the other hand, if you

1 think the witness testified untruthfully about some things but told
2 the truth about others, you may accept the part you think is true
3 and ignore the rest.

4 You must avoid bias, conscious or unconscious, based on a
5 witness's race, color, religious beliefs, national ancestry, sexual
6 orientation, gender identity, gender, or economic circumstances in
7 your determination of credibility.

8 The weight of the evidence as to a fact does not necessarily
9 depend on the number of witnesses who testify. What is important is
10 how believable the witnesses were, and how much weight you think
11 their testimony deserves.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.9 (2022 ed.)
28 [Credibility of Witnesses]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION No. 11

3 The defendant is charged in the information with assault on a
4 federal officer in violation of Section 111(a)(1) of Title 18 of the
5 United States Code. In order for the defendant to be found guilty
6 of that charge, the government must prove each of the following
7 elements beyond a reasonable doubt:

8 First, the defendant forcibly assaulted J.M.; and

9 Second, the defendant assaulted J.M. while J.M. was engaged in,
10 or on account of, his official duties.

11
12 There is a forcible assault when one person intentionally
13 strikes another, or willfully attempts to inflict injury on another,
14 or intentionally threatens another coupled with an apparent ability
15 to inflict injury on another which causes a reasonable apprehension
16 of immediate bodily harm.

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26 Ninth Circuit Model Criminal Jury Instructions, Nos. 8.1 (2022 ed.)
27 (Assault on a Federal Officer or Employee) (18 U.S.C. § 111(a))

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION No. 12

3 **[IF SELF-DEFENSE PERMITTED]**

4 The defendant asserts that he acted in self-defense. It is a
5 defense to the charge if (1) the defendant did not know that J.M.
6 was a federal officer or employee, (2) the defendant reasonably
7 believed that use of force was necessary to defend oneself against
8 an immediate use of unlawful force, and (3) the defendant used no
9 more force than appeared reasonably necessary in the circumstances.

10 Force which is likely to cause death or great bodily harm is
11 justified in self-defense only if a person reasonably believes that
12 such force is necessary to prevent death or great bodily harm. In
13 addition to proving all the elements of the crime beyond a
14 reasonable doubt, the government must also prove beyond a reasonable
15 doubt either (1) that the defendant knew that J.M. was a federal
16 officer or employee or (2) that the defendant did not reasonably
17 believe force was necessary to defend against an immediate use of
18 unlawful force, or (3) that the defendant used more force than
19 appeared reasonably necessary in the circumstances.

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25 Ninth Circuit Model Criminal Jury Instructions, Nos. 8.3 (2022 ed.)
26 (Assault on a Federal Officer or Employee-Defenses) (18 U.S.C.
27 § 111(a))

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 13

3 When you begin your deliberations, elect one member of the jury
4 as your foreperson who will preside over the deliberations and speak
5 for you here in court.

6 You will then discuss the case with your fellow jurors to reach
7 agreement if you can do so. Your verdict, whether guilty or not
8 guilty, must be unanimous.

9 Each of you must decide the case for yourself, but you should
10 do so only after you have considered all the evidence, discussed it
11 fully with the other jurors, and listened to the views of your
12 fellow jurors.

13 Do not be afraid to change your opinion if the discussion
14 persuades you that you should. But do not come to a decision simply
15 because other jurors think it is right.

16 It is important that you attempt to reach a unanimous verdict
17 but, of course, only if each of you can do so after having made your
18 own conscientious decision. Do not change an honest belief about
19 the weight and effect of the evidence simply to reach a verdict.

20 Perform these duties fairly and impartially. You should also
21 not be influenced by any person's race, color, religious beliefs,
22 national ancestry, sexual orientation, gender identity, gender, or
23 economic circumstances. Also, do not allow yourself to be
24 influenced by personal likes or dislikes, sympathy, prejudice, fear,
25 public opinion, or biases, including unconscious biases.
26 Unconscious biases are stereotypes, attitudes, or preferences that
27 people may consciously reject but may be expressed without conscious
28 awareness, control, or intention.

1 It is your duty as jurors to consult with one another and to
2 deliberate with one another with a view towards reaching an
3 agreement if you can do so. During your deliberations, you should
4 not hesitate to reexamine your own views and change your opinion if
5 you become persuaded that it is wrong.

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Ninth Circuit Model Criminal Jury Instructions, No. 6.19 (2022 ed.)
[Duty to Deliberate]

COURT'S INSTRUCTION NO.

JOINT PROPOSED INSTRUCTION NO. 14

Because you must base your verdict only on the evidence received in the case and on these instructions, I remind you that you must not be exposed to any other information about the case or to the issues it involves. Except for discussing the case with your fellow jurors during your deliberations:

Do not communicate with anyone in any way and do not let anyone else communicate with you in any way about the merits of the case or anything to do with it. This restriction includes discussing the case in person, in writing, by phone, tablet, computer, or any other means, via email, text messaging, or any Internet chat room, blog, website or any other forms of social media. This restriction applies to communicating with your family members, your employer, the media or press, and the people involved in the trial. If you are asked or approached in any way about your jury service or anything about this case, you must respond that you have been ordered not to discuss the matter and to report the contact to the court.

Do not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it; do not do any research, such as consulting dictionaries, searching the Internet or using other reference materials; and do not make any investigation or in any other way try to learn about the case on your own.

The law requires these restrictions to ensure the parties have a fair trial based on the same evidence that each party has had an opportunity to address. A juror who violates these restrictions

1 jeopardizes the fairness of these proceedings, and a mistrial could
2 result that would require the entire trial process to start over.
3 If any juror is exposed to any outside information, please notify
4 the court immediately.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.20 (2022 ed.)
28 [Consideration of Evidence -- Conduct of the Jury]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 15

3 Some of you have taken notes during the trial. Whether or not
4 you took notes, you should rely on your own memory of what was said.
5 Notes are only to assist your memory. You should not be overly
6 influenced by your notes or those of your fellow jurors.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.21 (2022 ed.)

28 [Use of Notes]

1 COURT'S INSTRUCTION NO.

2 JOINT PROPOSED INSTRUCTION NO. 16

3 The punishment provided by law for this crime is for the court
4 to decide. You may not consider punishment in deciding whether the
5 government has proved its case against the defendant beyond a
6 reasonable doubt.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.22 (2022 ed.)

28 [Jury Consideration of Punishment]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 17

3 A verdict form has been prepared for you. After you have
4 reached unanimous agreement on a verdict, your foreperson should
5 complete the verdict form according to your deliberations, sign and
6 date it, and advise the clerk that you are ready to return to the
7 courtroom.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.23 (2022 ed.)
28 [Verdict Form]

1 COURT'S INSTRUCTION NO. _____

2 JOINT PROPOSED INSTRUCTION NO. 18

3 If it becomes necessary during your deliberations to
4 communicate with me, you may send a note through the clerk, signed
5 by any one or more of you. No member of the jury should ever
6 attempt to communicate with me except by a signed writing, and I
7 will respond to the jury concerning the case only in writing or here
8 in open court. If you send out a question, I will consult with the
9 lawyers before answering it, which may take some time. You may
10 continue your deliberations while waiting for the answer to any
11 question. Remember that you are not to tell anyone -- including me
12 -- how the jury stands, numerically or otherwise, on any question
13 submitted to you, including the question of the guilt of the
14 defendant, until after you have reached a unanimous verdict or have
15 been discharged.

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27 Ninth Circuit Model Criminal Jury Instructions, No. 6.24 (2022 ed.)
28 [Communication with Court]