

(DEFENDANT'S REQUESTED)

JURY INSTRUCTION NO: \_\_\_\_\_

Proof of \_\_\_\_\_ (*set forth presumed fact*) is an essential element of \_\_\_\_\_ (*set forth crime*) as defined elsewhere in these instructions. The burden is on the state to prove \_\_\_\_\_ (*set forth presumed fact*) beyond a reasonable doubt.

In this case if you find that \_\_\_\_\_ (*here state basic fact or facts on which presumption rests*) [has] [have] been proved, you may but are not required to find that \_\_\_\_\_ (*presumed fact*) has been proved. You must consider all of the evidence in making your determination. In order to find the defendant guilty of \_\_\_\_\_ (*set forth offense charged*), [as charged in Count \_\_\_\_\_]<sup>2</sup>, you must be convinced beyond a reasonable doubt that the defendant \_\_\_\_\_ (*set forth presumed fact*).

UJI 14-5601

GIVEN \_\_\_\_\_

REFUSED \_\_\_\_\_