

STATE OF WISCONSIN

vs.

STEVEN A. AVERY,

Plaintiff,

Defendant,

STATE'S PROPOSED  
JURY INSTRUCTIONS

Case No. 05-CF-381

The State of Wisconsin, by Special Prosecutor Kenneth R. Kratz, proposes that the following jury instructions be presented in this matter:

- 50 Preliminary Instruction
- 55 Notetaking Permitted
- 100 Opening Instructions
- 101 Opening Statements
- 103 Evidence Defined
- 115 One Defendant – Six Counts
- 1010 First Degree Intentional Homicide
- 1193 Mutilating a Corpse
- 1343 Felon in Possession of a Firearm
- 1203 First Degree Sexual Assault
- 1281 Kidnapping
- 1275 False Imprisonment
- 140 Burden of Proof and Presumption of Innocence
- 145 Information Not Evidence
- 147 Improper Questions
- 148 Objections of Counsel; Evidence Received Over Objection
- 150 Stricken Testimony
- 155 Exhibits
- 157 Remarks of Counsel
- 160 Closing Arguments of Counsel
- 161 Agreed Testimony
- 170 Circumstantial Evidence
- 180 Confessions – Admissions

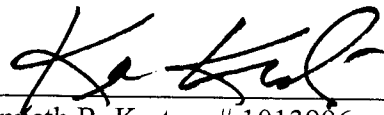
MANITOWOC COUNTY  
STATE OF WISCONSIN  
**FILED**

JAN 19 2007

**CLERK OF CIRCUIT COURT**

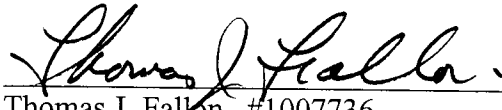
- 190 Weight of Evidence
- 195 Juror's Knowledge
- 200 Expert Opinion Testimony: General
- 205 Expert Testimony: Hypothetical Questions
- 247 Verdict as to Defendant Only
- 270 Evidence as to Defendant's Character
- 300 Credibility of Witnesses
- 315 Defendant Elects Not to Testify
- 325 Impeachment of Witness: Prior Conviction or Juvenile Adjudication
- 460 Closing Instruction
- 484 Verdicts Submitted for One Defendant: Six Counts: Separate Verdict on Each Count Required
- 515 Unanimous Verdict and Selection of Presiding Juror
- 525 Instruction After Verdict Received

Respectfully submitted this 19<sup>th</sup> day of January, 2007.



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Kenneth R. Kratz # 1013996  
Calumet County District Attorney  
Manitowoc County Special Prosecutor



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