

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Case No:23-CR-60173 Williams (Graham)

v.

CAROLYN D. WADE,

Defendant.

_____ /

DEFENDANT WADE’S PROPOSED JURY INSTRUCTION

The Defendant, **CAROLYN D. WADE**, through counsel, respectfully requests that the Court give the following instructions to the jury panel prior to their deliberations:

**Defendant’s Proposed Jury Instruction regarding
S6.1 ALIBI**

Evidence has been admitted that the defendant was not present at the time and place of the commission of the crime charged in the indictment.

The government has the burden of proving beyond a reasonable doubt the defendant was present at that time and place. The defendant does not have the burden of proving an alibi defense, nor does the defendant have to convince you that she was not present at the time and place of the commission of the crime.

If after consideration of all the evidence, you have reasonable doubt that the defendant was present at the time the crime was committed, you must find the defendant not guilty.

USA v. Carolyn D. Wade
Proposed Jury Instruction
Case NO. 23-cr-60173 Williams/Graham

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of the Notices of Electronic Filing generated by CMF-ECF or in some other authorized manner for those Counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully submitted,

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