

MEMORANDUM

Re: Updates to the Pattern Jury Instructions

Date: March 11, 2026

The following updates have been made to the Pattern Jury Instructions:

1. 1.28.1 Similar Acts - Self Defense was added to the instructions.
2. Former 1.28.1 Imperfect Self - Defense was renumbered to 1.28.2.
3. 1.28 Self-Defense or Defense of Another was changed as follows:

1.28 SELF-DEFENSE OR DEFENSE OF ANOTHER

The defendant [name the defendant] has offered evidence that he was acting in [self-defense] [defense of another].

A person is entitled to defend [himself] [another person] against the immediate use of unlawful force. But the right to use force in such a defense is limited to using only as much force as reasonably appears to be necessary under the circumstances.

[A person may use force which is intended or likely to cause death or great bodily harm only if he reasonably believes that force is necessary to prevent death or great bodily harm to [himself] [another]].

To find the defendant guilty of the crime charged in the indictment, you must be convinced that the government has proved beyond a reasonable doubt:

Either, the defendant did not act upon a reasonable belief that [he] [another] faced imminent danger of death or great bodily harm;

Or, it was not reasonable for the defendant to think that the force he used was necessary to defend [himself] [another person] against death or great bodily harm;