



**FROM THE COMMITTEE  
ON MODEL CRIMINAL  
JURY INSTRUCTIONS**

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The Committee on Model Criminal Jury Instructions solicits comment on the following proposal by November 1, 2025. Comments may be sent in writing to Christopher M. Smith, Reporter, Committee on Model Criminal Jury Instructions, Michigan Hall of Justice, P.O. Box 30052, Lansing, MI 48909-7604, or electronically to [MCrimJI@courts.mi.gov](mailto:MCrimJI@courts.mi.gov).

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**PROPOSED**

The Committee proposes amending M Crim JI 3.17 (Single Defendant-Single Count), M Crim JI 3.18 (Multiple Defendants-Single Count), M Crim JI 3.20 (Single Defendant-Multiple Counts-More Than One Wrongful Act), and M Crim JI 3.22 (Multiple Defendants-Multiple Counts-More Than One Wrongful Act) to present the possible verdicts in a consistent sequence, with “not guilty” appearing as the first option. Deletions are in ~~striketrough~~, and new language is underlined.

**[AMENDED]      M Crim JI 3.17      Single Defendant-Single  
Count**

You may return a verdict of not guilty or guilty of the alleged crime [, or guilty of a less serious crime,] ~~or not guilty~~.

**[AMENDED]      M Crim JI 3.18      Multiple Defendants-Single  
Count**

You must return a separate verdict for each defendant. This means that, for each individual defendant, you may return a verdict of not guilty or guilty of the alleged crime [, or guilty of a less serious crime,] ~~or not guilty~~.

**[AMENDED] M Crim JI 3.20**

**Single Defendant-Multiple  
Counts-More Than One  
Wrongful Act**

(1) The defendant is charged with \_\_\_\_ counts, that is, with the crimes of \_\_\_\_\_ and \_\_\_\_\_ . These are separate crimes, and the prosecutor is charging that the defendant committed [both / all] of them. You must consider each crime separately in light of all the evidence in the case.

(2) You may find the defendant not guilty or guilty of all or [any one / any combination] of these crimes [, or guilty of a less serious crime,] ~~or not guilty~~.

**[AMENDED] M Crim JI 3.22**

**Multiple Defendants-Multiple  
Counts-More Than One  
Wrongful Act**

(1) The defendants are each charged with \_\_\_\_ counts, that is, with the crimes of \_\_\_\_\_ and \_\_\_\_\_. These are separate crimes, and the prosecutor is charging that each defendant committed [both / all] of them. You must consider each crime separately in light of all the evidence.

(2) You must return a separate verdict for each defendant. For each defendant, you may return a verdict of not guilty or guilty of one or more of the alleged crimes [, or guilty of a less serious crime,] ~~or not guilty~~. Remember that you must consider each defendant separately.