

**CHARGE DRAFTING: DEFENSIVE STRATEGY**

- (1) ... Present or Explain:
- (a) ... All relevant facts;
  - (b) ... The "relevant" legal and factual "background";
  - (c) ... All other relevant evidence which bears upon these questions;
  - (d) ... Any relevant statute, rule of procedure, or other authority;
  - (e) ... Any relevant treatise, book, article, journal, or writing;
  - (f) ... Any relevant article in a newspaper, magazine, or other publication;
  - (g) ... Any relevant document, record, or other material;
  - (h) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (i) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (j) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (k) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (l) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (m) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (n) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (o) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (p) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (q) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (r) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (s) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (t) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (u) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (v) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (w) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (x) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (y) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;
  - (z) ... Any relevant witness, including the State's witness, who has been interviewed by the defense attorney;