

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : CASE NO. 22-cr-185 (JDB)  
 :  
 YVONNE ST CYR, :  
 :  
 Defendant. :

**GOVERNMENT’S PROPOSED JURY INSTRUCTION**

**PROOF OF STATE OF MIND<sup>1</sup>**

Someone’s intent or knowledge ordinarily cannot be proved directly because there is no way of knowing what a person is actually thinking, but you may infer someone’s intent or knowledge from the surrounding circumstances. You may consider any statement made or acts done or omitted by the defendants, and all other facts and circumstances received in evidence which indicate their intent or knowledge.

You may infer, but are not required to infer, that a person intends the natural and probable consequence of acts they intentionally did or did not do. It is entirely up to you, however, to decide what facts to find from the evidence received during this trial. You should consider all the circumstances in evidence that you think are relevant in determining whether the government has proved beyond a reasonable doubt that the defendant acted with the necessary state of mind.

While Ms. St Cyr must act with the intent as I describe below for each charged crime, this need not be Ms. St Cyr’s sole purpose. Ms. St Cyr’s unlawful intent is not negated by the simultaneous presence of another purpose for Ms. St Cyr’s conduct.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

By: /s/ Jacqueline Schesnol  
Jacqueline Schesnol  
Assistant United States Attorney

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<sup>1</sup> *United States v. Rhodes, et al.* (Rhodes trial I and II), 22-cr-15 (ECF 396 at 15 and ECF 457 at 14-15, respectively); *see also United States v. Herrera*, 21-cr-619 (ECF 65 at 7); *United States v. Strand*, 21-cr-85 (ECF 112 at 12).

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