A “reasonable” doubt is a fair, honest doubt growing out of the evidence or lack of evidence, and based on reason and common sense. Ultimately, a “reasonable doubt” would simply be a doubt that you find to be reasonable after you have carefully and thoughtfully examined and discussed the facts and circumstances present in this case.

Proof "beyond a reasonable doubt" does not mean proof that amounts to absolute certainty, or beyond all possible doubt. It does not mean proof “beyond a shadow of doubt,” nor does it mean that the government must prove any fact or any crime with mathematical precision. Doubts that are merely imaginary, or that arise from nothing more than speculative possibilities, or that are based only on sympathy, prejudice or guessing are not “reasonable” doubts.

In addition, the law does not require that every particular fact mentioned in the case be proved beyond a reasonable doubt. Rather, the law requires that enough facts be proved to convince you, beyond a reasonable doubt, that the crime was committed and that the defendant is guilty.

If you are convinced that the government, through the evidence, has proved the defendant guilty beyond a reasonable doubt, then the proper verdict is “guilty.” If you are not convinced, a “not guilty” verdict must be returned.