



UNITED STATES

V.

REY LEVIS

NTL 2023 FACT PATTERN #2

STIPULATIONS

Procedural matters

1. Federal Rules of Criminal Procedure and Federal Rules of Evidence apply.
2. All witnesses called to testify who have identified the parties, other individuals, or tangible evidence at deposition or prior testimony will, if asked, identify the same at trial.
3. Grand Jury testimony is given under oath and contains a full and complete description of all material events that occurred, and all witnesses agree that the statements given are a full and complete statement without errors or additions.
4. All reports and statements were signed under oath.
5. Each party must call one witness. Witnesses may be played by students of any gender. The Prosecution will call Kyle Douty. The Defense will call Rey Levis.
6. Other than what is provided, there is nothing unusual that would detract from the background information of any of the witnesses that would bolster or detract from their credibility.
7. This competition does not permit a witness to invent a material fact. For clarity's sake, a material fact is a fact that would influence an element or defense in a substantive way to make it unfair for another team to provide a fair rebuttal. Invention of individuals is fair as long as they do not affect each parties' burdens.
8. "Beyond the record" will not be entertained as an objection.
9. All exhibits are considered authentic for evidentiary purposes.
10. Jurisdiction is established. No challenges to jurisdiction shall be entertained.
11. The trial is taking place on September 12, 2023.
12. Pretrial motions can consist of any evidentiary argument made for either side. Each side will have a total of five (5) minutes to do so. Each side will also have a total of five (5) minutes to argue the jury instructions prior to closings. Additional time may be granted at the discretion of the presiding judge for pre-closing motions pertaining to the jury instructions. No motions to suppress evidence on the grounds that it was obtained in violation of the Fourth or Fifth Amendment were brought prior to trial. No such motions will be entertained or serve as grounds for exclusion at trial.
13. This competition does not allow outside case law for argument.
14. Any objections to the indictment have already been heard and overruled. No objection to the indictment shall be entertained.

Substantive Matters

1. Shannon Schay has been indicted by a grand jury as a co-conspirator and an arrest warrant has been issued.
2. The defense may adopt any theory of defense it so chooses.
3. Exhibit A is the car registration to the vehicle shown in Exhibit F.
4. Exhibits A and H are admissible without objection.
5. Exhibits C-1 and C-2 are the attachments from Exhibit B.
6. Exhibit C-1 is text messages sent on August 29, 2020, at 8:34PM.
7. Exhibit C-2 is text messages sent on August 30, 2020, at 9:04AM.
8. C.O. Schroeder and C.O. Taylor are unavailable. However, if they were called to testify, they would testify consistently with Douty's report. Specifically, C.O. Schroeder would testify she personally saw Tim Sanduvall at the 9:00AM count and further observed Sanduvall was not present at the 12:00PM count.
9. As of the date of the trial, Tim Sanduvall remains at large. He is not in custody of the prison and did not have permission to leave the prison. He has been charged with the crime of escape and a warrant has been issued for his arrest.
10. While there is no video of the escape, Exhibit F is a still shot taken on the day of the escape from around 10:00AM. This photo was taken from a camera positioned about 10 feet from where the hole in the East Fence was found.

EXHIBIT LIST

Exhibit A – Car Registration

Exhibit B – Email

Exhibit C – Text Messages

Exhibit D – Transcript of Calls

Exhibit E – Request Slip to Staff

Exhibit F – Photo of Car

Exhibit G – Wanted Poster

Exhibit H – Criminal Record

Exhibit I - Criminal Record

Exhibit J – Bank Record

**IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF ORANGE**

<p>UNITED STATES,</p> <p style="text-align:center">Prosecution,</p> <p style="text-align:center">vs.</p> <p>REY LEVIS</p> <p style="text-align:center">Defendant.</p>	<p style="text-align:center">No. 2023-CV-613-CR</p>
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INDICTMENT

Ariana Maddox, United States Attorney

Katie Marooney, Assistant United States Attorney

Violation(s): 18 U.S.C. Section 752(a) [Assisting Escape]

THE GRAND JURY CHARGES:

COUNT ONE [ASSISTING ESCAPE]

On or about August 30, 2020, in Clementine County in the Northern District of Orange, the Defendant, **REY LEVIS**, assisted the escape of Tim Sanduvall, in that the Tim Sanduvall was in custody of the Federal Correctional Institution at Orange by virtue of a felony conviction, Tim Sanduvall left such custody without permission, the defendant knew Tim Sanduvall did not have permission to leave, and assisted Tim Sanduvall in leaving custody, all in violation of Title 18, United States Code, Section 1951(a).

DATE: January 27, 2023

I, FOREMAN, certify this to be a TRUE BILL, of the Grand Jury's findings.

Ken Todd

FEDERAL BUREAU OF INVESTIGATION
SPECIAL INVESTIGATION DIVISION

SPECIAL AGENT KYLE DOUTY

January 27, 2023

UNITED STATES V. REY LEVIS
NO. 2023-CV-613-CR

SYNOPSIS: Based on my investigation of the crimes at Federal Correctional Institution at Orange, I've concluded that Rey Levis, "Levis," was an actor in the crimes at FCI Orange. I have also concluded that Tim Schultz aided Levis and Sanduvall in the planning of the crime.

INVESTIGATIVE NARRATIVE: On August 30, 2020, around 12:00PM, the Bureau received a report from FCI Orange of an inmate escape. I was assigned to the investigation. I went to FCI Orange and spoke to several corrections officers. Corrections Officer Stacy Schroeder informed me that Inmate Tim Sanduvall had escaped through a hole in the fence line between the 9:00AM count and 12:00PM count. CO Schroeder told me to check in with the security office as they would be able to show me the surveillance footage from that day. I then went to the security office and spoke with CO Jackson Taylor. CO Taylor informed me that, due to an unforeseen issue with the servers, the video footage was permanently deleted. I asked CO Taylor if he had seen anything prior to the deletion, and he stated he did see a blue Toyota Corolla outside the main gates on the East Side of the prison. He could not remember a license plate.

On August 31, 2020, I received the recorded phone calls from calls made by Tim Sanduvall. Sanduvall made a series of calls made to Shannon Schay. Shannon Schay is Sanduvall's sister. These phone calls revealed that Shannon Schay and Sanduvall created a plan for Sanduvall's escape. Sanduvall was to make an appointment to go to the Chaplaincy Department as the Chapel is located on the east side of the prison grounds. Prior to Sanduvall's appointment, Schay would cut a hole in the east side fence behind the Chapel and wait just beyond in a car. However, the two knew the prison had surveillance cameras along the outside of the prison. Schay was to ask Sanduvall's best friend, Levis, for Levis' car.

On September 7, 2020, I received an email with text messages between Levis and Schay. The text messages revealed that Schay and Levis met at the Matador Bar on August 29, 2020. The following day, the two confirmed the plan for Schay to take Levis' car. With this information, I received an arrest warrant for Rey Levis and Shannon Schay as well as a search warrant for Levis' home and assets.

On September 8, 2020, Rey Levis was arrested. Levis' blue Toyota Corolla was searched as well as Levis' apartment. Local authorities and the Bureau have been unable to locate Shannon Schay.

On September 21, 2020, I received a copy of Levis' bank statement for August 20, 2020, to September 20, 2020.

MATERIALS REVIEWED: Affidavit of Rey Levis, call transcripts between Schay and Sanduvall, text messages between Schay and Levis, Levis' car registration; request slip; bank statement and wanted poster.

CERTIFICATION: On the 27th day of January 27, 2020, I certify, under penalty of perjury, that I have carefully reviewed the above report to determine whether the information contained is true and correct, and whether I had any additional information relevant to the matters therein. I hereby certify, under penalty of perjury, that the report is accurate, and I have no information relevant to the matters discussed other than what is discussed in this report. Everything was covered and nothing was left out.

Kyle Douty

Kyle Douty

FEDERAL BUREAU OF INVESTIGATION
SUPPORTING AFFIDAVIT

UNITED STATES V. REY LEVIS
NO. 2023-CV-613-CR

I, Rey Levis, born 09/12/1994, reside at 425 Lightning Blvd., in Clementine, Orange. I am providing this voluntary statement to Agent Douty after being advised of and waiving my Miranda rights.

I have known Tim Sanduvall since we were in middle school. We were troublemakers but I straightened my life out. Sandy got into some intense stuff, and I didn't want to get in trouble. I went to college at Sonoma State University and got my bachelor's degree in chemistry. I am now going to graduate school to be an occupational therapist.

Back in 2019, Sandy got jammed up for some drug mule type stuff. I was not into it. The police got involved, and somehow, I ended up sitting in a cell right next to Sandy. We always said we were partners in crime, but I didn't mean it literally. Sandy somehow got me out of trouble, I don't know. The next day I was out, and Sandy called me from jail. He told me I owed him, but I didn't really know what he meant. I kept clear of all of his troubles but kept in touch with Shannon Schay. Shannon and I got really close after Tim was found guilty and sent to FCI Orange. I'd do anything for Shannon.

On August 29, 2020, I got a text from Shannon asking to meet for drinks at the Matador. This is normal for us, and I never say no to a drink. I met up with Shannon and we got some light appetizers and started drinking. Shannon said she was having a rough night and wanted to do rounds of shots. The next thing I knew, we were three rounds deep on tequila shots. I don't remember anything else about that night or even how I got home. The next day, Shannon texted me about using my car to go to Sanduvall. I thought she just needed my car to go visit, not break him out! Sure, it was weird that she needed my car to begin with since she has her own, but I didn't think anything of it. I helped Shannon get that job in California. That's why she needed to see Sandy that day, because she's moving. I needed my car to drive to a poker game Shannon told me about. I didn't know any of the guys, but the payout was around \$10,000 and I didn't want to miss it.

I have seen and can recognize the text messages, my bank record, my criminal record, photo of my car, and Shannon's wanted poster.

Rey Levis

September 9, 2020

Rey Levis

False statements made herein are punishable as a Class A misdemeanor.



PLATE 4XWNN9	REGISTRATION NO REG5544	TYPE P	EFFECTIVE 1/20/20	EXPIRATION 1/20/21
MODEL YEAR 2018	MAKE TOYOTA	MODEL CORROLA	BODY TYPE SEDAN	COLOR BLUE
VIN JKNEFW458JDNLS18	INSURANCE WAYSTATE	TITLE NUMBER		
NAME OF OWNER REY LEVIS				

Exhibit
A

Douty, Kyle

Date: September 7, 2020
From: Schay, Shannon <g00dasgold@gmail.com>
To: Douty, Kyle kdouty@fbi.gov
Subject: for your file
Attachments: Screenshot1.jpg; Screenshot2.jpg

Mr. Douty,

I was told you are the officer investigating the escape of Tim Sanduvall. Look, I don't know where Sandy is and I don't care. But what I don't want is that weasel Rey saying that it's all my fault! That's ridiculous! Rey told me at the Matador that I could use the Toyota. I took screenshots of our text messages right after I sent them. Rey knew what I was going to do. This sweet little Bambi act isn't going to work. Rey knew exactly what the plan was and even said that as long as we took the car back to the house before we skipped town, it would be fine. Then no one could link Rey! Rey had every hand in this.

BTW. I am not coming in no matter what deal you think you can offer me. I am closing this account down and will be far from where I sent it. (Gotta love schedule send). You'll never find me and I know that you will hate that I slipped away.

XOXO

Shannon

Exhibit

B

Hey Rey!

Hey Shan!

Wanna hit the matador tonight?

Of course!

9?

See you there

**Exhibit
C-1**

Verizon LTE

9:04 AM

75%

[Messages](#)

REY

[Details](#)

Rey, I am on my way to get the car now

You still good with this plan?

Yes, anything for Sandy

I just want to make sure I can use your car to go to Sandy

Yes, just bring my car back before you leave town



iMessage



Exhibit

C-2

**FEDERAL CORRECTIONAL INSTITUTION AT ORANGE
SECURITY OFFICE
TRANSCRIPT OF CALL**

**CALL DATE: 06/27/20 TIME:0945 INMATE: SANDUVALL, TIM
PHONE NUMBER: 727-445-1545 APPROVED? Y NAME: SCHAY, SHANNON**

INMATE: Shannon, you there?

SCHAY: Hey Sandy, I'm here.

INMATE: You have to get me out of here.

SCHAY: I know, I know. I'm working on it. Listen, can you get a pass to the chapel easily?

INMATE: Yes, I think so.

SCHAY: Okay, I think that will be your way out.

INMATE: That's along the east gate, seems to be a pretty easy place to get lost.

SCHAY: What do you mean?

INMATE: There aren't a lot of guards around there, especially when there isn't a service happening at the chapel.

SCHAY: Good, okay. I will keep working.

--- end of call ---

Certification: The undersigned certifies that this is a truthful and accurate log of the call made by Inmate Sanduvall to Shannon Schay on June 27, 2020.

Jackson Taylor

8/31/20

Exhibit

D-1

**FEDERAL CORRECTIONAL INSTITUTION AT ORANGE
SECURITY OFFICE
TRANSCRIPT OF CALL**

**CALL DATE: 07/20/20 TIME:0945 INMATE: SANDUVALL, TIM
PHONE NUMBER: 727-445-1545 APPROVED? Y NAME: SCHAY, SHANNON**

INMATE: Shannon?

SCHAY: Hey Sandy.

INMATE: What's going on?

SCHAY: I have a plan, but I'm worried about cameras.

INMATE: Don't take your car, that will be way too easy to track.

SCHAY: Yeah, just have to find someone who will be willing.

INMATE: Ask Rey. Rey knows my situation and will help me.

SCHAY: Good idea, I will talk to Rey and try to use Rey's car.

INMATE: Just buy tequila, that always gets Rey in an agreeable mood.

SCHAY: Good call. I'll talk to you soon.

--- end of call ---

Certification: The undersigned certifies that this is a truthful and accurate log of the call made by Inmate Sanduvall to Shannon Schay on July 20, 2020.

Jackson Taylor

8/31/20

Exhibit

D-2

FEDERAL CORRECTIONAL INSTITUTION AT ORANGE
SECURITY OFFICE
TRANSCRIPT OF CALL

CALL DATE: 08/29/20 TIME:1040 INMATE: SANDUVALL, TIM
PHONE NUMBER: 727-445-1545 APPROVED? Y NAME: SCHAY, SHANNON

INMATE: Shannon?

SCHAY: Hey Sandy.

INMATE: I got the pass.

SCHAY: For when?

INMATE: Tomorrow, I have to go right after morning count.

SCHAY: Okay, I will be there. You know what to do.

INMATE: I do. Did you ask Rey for the car?

SCHAY: I'm going to ask Rey tonight at the bar.

INMATE: Talk about waiting until the last minute.

SCHAY: It will be fine. Have some faith.

--- end of call ---

Certification: The undersigned certifies that this is a truthful and accurate log of the call made by Inmate Sanduvall to Shannon Schay on August 29, 2020.

Jackson Taylor

8/31/20

Exhibit

D-3

FEDERAL CORRECTIONAL INSTITUTION AT ORANGE

INMATE REQUEST SLIP TO STAFF

Tim Sanduvall

Inmate Name

GC4457

Inmate Number

L Block

Housing Assignment

Chaplaincy Department

Staff Member/Department

8/27/20

Date

Request:

I need an appointment with the Chaplaincy Department. I
heard from my sister that our family fish has died and I
need to talk to someone about grief.

Response:

While we typically do not provide grief counseling for pets, you can see the grief counselor in the Chapel after the GAM count on Sunday.

Brock Honey

Staff member signature

Exhibit

E



Exhibit

F



WANTED

Assisting Escape

SHANNON SCHAY



DESCRIPTION

Date of Birth:	June 15, 1990	Hair:	Brown
Place of Birth:	Los Angeles, California	Eyes:	Brown
Height:	5'2		
Weight:	140		
NCIC:	S4477885566		

Exhibit

G

**Orange Department of Justice
Criminal Records Division
Certification of Criminal Records**

Tim Sanduvall

10/12/1994

XXX-XX-7784

THE FOLLOWING INFORMATION IS A CERTIFIED RECORD. THE RECORD HAS BEEN KEPT IN THE NATURAL COURSE OF BUSINESS AND MAINTAINED BY THE CRIMINAL RECORDS DIVISION IN ACCORDANCE WITH LOCAL AND FEDERAL LAWS.

Criminal History of Tim Sanduvall

Date	Conviction	Disposition	Max Sentence
05/12/19	Drug Trafficking (Schedule II)	10-15 Years Imprisonment	Life

The undersigned certifies that the above record is truthful, accurate, and complete. This is an authentic record of the Criminal Records Division of the Orange Department of Justice.

Brittany Taylor

Brittany Taylor
Director of Criminal Records

Exhibit

H

**Orange Department of Justice
Criminal Records Division
Certification of Criminal Records**

Rey Levis

09/12/1994

XXX-XX-8874

THE FOLLOWING INFORMATION IS A CERTIFIED RECORD. THE RECORD HAS BEEN KEPT IN THE NATURAL COURSE OF BUSINESS AND MAINTAINED BY THE CRIMINAL RECORDS DIVISION IN ACCORDANCE WITH LOCAL AND FEDERAL LAWS.

Criminal History of Rey Levis

Date	Conviction	Disposition	Max Sentence
03/11/12	Theft by Deception	1 Year Probation	1 Year Imprisonment
11/08/15	Driving Under Influence Alcohol (General Impairment)	3 Months Imprisonment	6 Months Imprisonment

Date	Charge	Disposition
05/12/19	Drug Trafficking (Schedule II)	Not Guilty

The undersigned certifies that the above record is truthful, accurate, and complete. This is an authentic record of the Criminal Records Division of the Orange Department of Justice.

Brittany Taylor

Brittany Taylor
Director of Criminal Records

Exhibit

I

MM Bank
 1234 1st Avenue SW
 Anytown, AL T2T 1P3
 Tel: 1-888-123-4567

REY LEVIS
 425 Lightning Blvd.
 Clementine, Orange, 77589

Statement of Account		Account Type	Statement From To
Branch No.	Account No.	Everyday Checking	AUG. 20, 2020 – SEP. 20, 2020
01234	1234-1234567	Account	Page 1 of 1

DESCRIPTION	WITHDRAWALS	DEPOSITS	DATE	BALANCE
Balance Forward			Aug 20	\$2,000
ATM W/D	\$103		Aug 21	\$1,897
ATM W/D	\$25		Aug 23	\$1,872
Grocery Store	\$50		Aug 28	\$1,822
ATM W/D	\$500		Aug 30	\$1,322
Cash		\$9,000	Aug. 30	\$10,322
Cell Phone Bill	\$45		Sep. 03	\$10,277
	\$723	\$9,000		

Account issued by: MM bank

Please ensure that you report in writing any errors or irregularities found within this statement within 30 days of the statement date. If you do not, the statement of account shall be conclusively deemed correct except for any amount credited to the account in error.



CERTIFICATION OF BUSINESS RECORDS AND BILLS

I, **Peter Madrigal**, certify under penalty of perjury that:

1. I am a duly authorized employee, agent, officer, member, and/or principal of MM Bank and am the custodian or other qualified witness with respect to the attached documents, medical records, images, billing records and account information;
2. I have authority to make this certification;
3. That to the best of my knowledge, after reasonable inquiry, the records or copies thereof are accurate versions of the documents described in the request and/or subpoena duces tecum that are in the possession, custody, or control of MM Bank;
4. That to the best of my knowledge, after reasonable inquiry, the records or copies attached represent all the documents described in the request and/or subpoena duces tecum, or if they do not represent a complete set of the documents requested and/or subpoenaed, an explanation of which documents are missing and a reason for their absence is provided;
5. That the attached records or copies were made by the personnel or staff of the business, or persons acting under their control, in the regular course of business, at the time of the act, transaction, occurrence, or event recorded therein, or within a reasonable time thereafter, and that it was the regular course of business to make such records;
6. That the attached bill(s), records, and charges are true and accurate and each of the items therein was necessarily furnished and supplied and is accurate; and
7. That I have read the preceding statement and know the contents thereof, and that the same is true to the best of my knowledge.

DATE 9/21/20

SIGNATURE: *Peter Madrigal*



JURY INSTRUCTIONS

Assisting Escape (18 U.S.C SECTION 752(a))

The defendant is charge in Count One of the indictment with assisting escape in violation of Section 752(a) of Title 18 of the United States Code. In order for the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, Tim Sanduvall was in the custody of the Federal Correctional Institution at Orange by virtue of a felony conviction;

Second, Tim Sanduvall left custody without permission;

Third, the defendant knew Tim Sanduvall did not have permission to leave; and

Fourth, the defendant assisted Tim Sanduvall in leaving.

Aiding and Abetting

A defendant may be found guilty of Assisting Escape, even if the defendant personally did not commit the act or acts constituting the crime but aided and abetted in its commission. To “aid and abet” means intentionally to help someone else commit a crime. To prove a defendant guilty of Assisting Escape by aiding and abetting, the government must prove each of the following beyond a reasonable doubt:

First, someone else committed Assisting Escape;

Second, the defendant aided, counseled, commanded, induced or procured that person with respect to at least on element of Assisting Escape;

Third, the defendant acted with the intent to facilitate Assisting Escape; and

Fourth, the defendant acted before the crime was completed.

It is not enough that the defendant merely associated with the person committing the crime, or unknowingly or unintentionally did things that were helpful to that person, or was present at the scene of the crime. The evidence must show beyond a reasonable doubt that the defendant acted with the knowledge and intention of helping that person commit Assisting Escape.

A defendant acts with the intent to facilitate the crime when the defendant actively participates in a criminal venture with advance knowledge of the crime.

A defendant must be found guilty of the crime charged even if the defendant did not personally commit the act(s) constituting the crime if the defendant willfully caused an act to be done that if directly performed by him would be an offense.

Voluntary Intoxication

You may consider evidence, if any, of the defendant's voluntary intoxication only in a limited way. You may consider that evidence only in deciding whether the defendant intentionally aided Tim Sanduvall in his escape.

A person is voluntarily intoxicated if he or she becomes intoxicated by willingly using any intoxicating drug, drink, or other substance knowing that it could produce an intoxicating effect, or willingly assuming the risk of that effect.

Reasonable Doubt

A fundamental principle of our system of criminal law is that the defendant is presumed to be innocent. The mere fact that s/he was arrested and is accused of a crime is not any evidence against them. Furthermore, the defendant is presumed innocent throughout the trial and unless and until you conclude, based on careful and impartial consideration of the evidence, that the prosecution has proven them guilty beyond a reasonable doubt.

It is not the defendant's burden to prove that s/he is not guilty. Instead, it is the prosecution that always has the burden of proving each and every element of the crime charged, and that the defendant is guilty of that crime beyond a reasonable doubt. The person accused of a crime is not required to present evidence or prove anything in his or her own defense. If the prosecution's evidence fails to meet its burden, then your verdict must be not guilty. On the other hand, if the prosecution's evidence does prove beyond a reasonable doubt that the defendant is guilty, then your verdict should be guilty.

Although the prosecution has the burden of proving that the defendant is guilty, this does not mean that they must prove its case beyond all doubt and to a mathematical certainty, nor must it demonstrate the complete impossibility of innocence. A reasonable doubt is a doubt that would cause a reasonably careful and sensible person to hesitate before acting upon a matter of importance in his or her own affairs. A reasonable doubt must fairly arise out of the evidence that was presented or out of the lack of evidence presented with respect to some element of the crime. A reasonable doubt must be a real doubt; it may not be an imagined one, nor may it be a doubt manufactured to avoid carrying out an unpleasant duty.

So, to summarize, you may not find the defendant guilty based on a mere suspicion of guilt. The prosecution has the burden of proving the defendant guilty beyond a reasonable doubt. If it meets that burden, then the defendant is no longer presumed innocent, and you should find them guilty. On the other hand, if the prosecution does not meet its burden, then you must find them not guilty.

Direct v. Circumstantial

The evidence in this case is of two different types. On the one hand, there is direct evidence, which is testimony by a witness from his or her own personal knowledge, such as something that he or she saw or heard himself or herself.

The other type is circumstantial evidence, which is testimony about facts that point to the existence of other facts that are in question. Whether or not circumstantial evidence is proof of

the other facts in question depends in part on the application of common sense and human experience. You should recognize that it is sometimes necessary to rely upon circumstantial evidence in criminal cases, particularly where the crime was committed in secret.

In deciding whether or not to accept circumstantial evidence as proof of the facts in question, you must be satisfied, first, that the testimony of the witness is truthful and accurate and, second, that the existence of the facts the witness testifies to leads to the conclusion that the facts in question also happened.

Circumstantial evidence alone may be sufficient to prove the defendant's guilt. If there are several separate pieces of circumstantial evidence, it is not necessary that each piece standing separately convince you of the defendant's guilt beyond a reasonable doubt. Instead, before you may find the defendant guilty, all the pieces of circumstantial evidence, when considered together, must reasonably and naturally lead to the conclusion that the defendant is guilty and must convince you of the defendant's guilt beyond a reasonable doubt. In other words, you may find the defendant guilty based on circumstantial evidence alone, but only if the total amount and quality of that evidence convinces you of the defendant's guilt beyond a reasonable doubt.