

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	JURY INSTRUCTIONS
	)	
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Members of the Jury:

In the next few moments, I will give you instructions about this case and about your duties as jurors. I will also give you additional instructions later. Unless I specifically tell you otherwise, all instructions—both those I give you now and those I give you later—are equally binding on you and must be followed.

The instructions I am about to give you now are in writing and will be available to you in the jury room. In considering these instructions, attach no importance or significance whatsoever to the order in which they are given.

INSTRUCTION NO. 1

This is a criminal case the United States has brought against the defendant. The charges are set forth in what is called an Indictment.

The Indictment charges that, on or about the dates listed below, in the Northern District of Iowa, defendant Jonathan Quinn Carter knowingly and intentionally distributed 50 grams or more of actual (pure) methamphetamine, commonly called “ice” methamphetamine, a Schedule II controlled substance.

Count	Date
1	June 16, 2025
2	June 19, 2025
3	July 7, 2025
4	July 14, 2025
6	July 30, 2025

The Indictment also charges that, on or about the dates listed below, in the Northern District of Iowa, defendant Jonathan Quinn Carter knowingly and intentionally distributed, and did aid, abet, counsel, command, induce, and procure the distribution of, 50 grams or more of actual (pure) methamphetamine, commonly called “ice” methamphetamine, a Schedule II controlled substance.

Count	Date
5	July 22, 2025
7	August 10, 2025
8	August 18, 2025

The defendant has pled not guilty to the charges. Keep in mind that each count charges a separate crime. You must consider each count separately and return a separate verdict for each count.

You are instructed that an Indictment is simply an accusation. It is not evidence of anything. The defendant has pled not guilty, and he is presumed to be innocent unless and until proven guilty beyond a reasonable doubt. Thus, the defendant begins the trial

(CONTINUED)

INSTRUCTION NO. 1 (Cont'd)

with a clean slate, with no evidence against him. The presumption of innocence alone is sufficient to find the defendant not guilty and can be overcome only if the government proves during the trial, beyond a reasonable doubt, each element of the crime charged.

There is no burden upon the defendant to prove that he is innocent. Instead, the burden of proof remains on the government throughout the trial. Accordingly, if the defendant does not testify, that fact must not be considered by you in any way, or even discussed, in arriving at your verdicts.

You will note the Indictment alleges the offenses were committed “on or about” certain dates. The government need not prove with certainty the exact date or the exact time period of the offenses. It is sufficient if the evidence establishes that the offenses occurred within a reasonable time of the date or period of the time alleged in the Indictment.

INSTRUCTION NO. 2

You are instructed as a matter of law that a mixture or substance containing a detectable amount of methamphetamine and actual (pure) methamphetamine are Schedule II controlled substances.

INSTRUCTION NO. 3

You are instructed that Cedar Rapids, Iowa, is in the Northern District of Iowa. You are also instructed that you may find that an offense occurred in the Northern District of Iowa if you find that the offense began in, continued, or was completed in the Northern District of Iowa. The government must prove it is more likely true than not true that the offense charged occurred in the Northern District of Iowa. This is a lower standard than proof beyond a reasonable doubt.

INSTRUCTION NO. 4

The crime of distribution of a controlled substance, as charged in Counts 1, 2, 3, 4, and 6 of the Indictment, has two elements, which are:

One, on or about each respective date listed below, the defendant intentionally transferred a mixture or substance containing a detectable amount of methamphetamine to another individual; and

Count	Date
1	June 16, 2025
2	June 19, 2025
3	July 7, 2025
4	July 14, 2025
6	July 30, 2025

Two, at the time of the transfer, the defendant knew that it was a controlled substance.

For you to find the defendant guilty of the respective crime of distribution of a controlled substance, you must unanimously find the government proved these two elements beyond a reasonable doubt; otherwise, you must find the defendant not guilty of the respective crime charged in Counts 1, 2, 3, 4, or 6 of the Indictment.

INSTRUCTION NO. 5

Counts 5, 7, and 8 of the Indictment charge the defendant with distributing, and aiding and abetting the distribution of, a controlled substance. The defendant may be found guilty of these offenses under one of the two following alternatives: (1) personally distributing a controlled substance, or (2) aiding and abetting the distribution of a controlled substance.

First Alternative: Personally Distributing a Controlled Substance

The crime of personally distributing a controlled substance has two essential elements, which are:

One, on or about each respective date listed below, the defendant intentionally transferred a mixture or substance containing a detectable amount of methamphetamine to another individual; and

Count	Date
5	July 22, 2025
7	August 10, 2025
8	August 18, 2025

Two, at the time of the transfer, the defendant knew that it was a controlled substance.

For you to find the defendant guilty of the respective crime of personally distributing a controlled substance, you must unanimously find the government proved these two elements beyond a reasonable doubt; otherwise, you must find the defendant not guilty of the respective crime charged in Counts 5, 7, and 8 of the Indictment of personally distributing a controlled substance.

(CONTINUED)

INSTRUCTION NO. 5 (Cont'd)

Second Alternative: Aiding and Abetting the Distribution of a Controlled Substance

The defendant may be found guilty of distributing a controlled substance even if he personally did not do every act constituting the offense charged, if he aided and abetted the distribution of a controlled substance.

The crime of distribution of a controlled substance by aiding and abetting has four essential elements, which are:

One, on or about each respective date below, the defendant knew the distribution of a controlled substance was being committed or was going to be committed;

Count	Date
5	July 22, 2025
7	August 10, 2025
8	August 18, 2025

Two, the defendant had enough advanced knowledge of the extent and character of the distribution that he was able to make the relevant choice to walk away from the distribution before all elements of the distribution were complete;

Three the defendant knowingly acted in some way for the purpose of causing, encouraging or aiding the commission of the distribution of a controlled substance; and

Four the defendant intended that the crime of distribution of a controlled substance be committed.

To find the defendant guilty of distribution of a controlled substance by aiding and abetting, you must unanimously find the government proved these four elements beyond a reasonable doubt; otherwise, you must find the defendant not guilty of the respective crime charged in Counts 5, 7, or 8 of the Indictment of distribution of a controlled substance by aiding and abetting.

(CONTINUED)

INSTRUCTION NO. 5 (Cont'd)

The government must prove beyond a reasonable doubt that all of the elements of distribution of a controlled substance were committed by some person or persons and that the defendant aided and abetted the commission of that crime.

You may infer the defendant had the requisite advance knowledge of the distribution if you find the defendant failed to object or withdraw from actively participating in the commission of the distribution after the defendant observed another participant completed the distribution to another individual.

You should understand that merely being present at the scene of an event or merely acting in the same way as others or merely associating with others does not prove that a person has become an aider and abettor. A person who has no knowledge that a crime is being committed or about to be committed, but who happens to act in a way which advances some offense, does not thereby become an aider and abettor.

INSTRUCTION NO. 6

It is not necessary the defendant knew that the controlled substance was a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine, as long as the defendant knew the mixture or substance was some controlled substance.

The term “distribute” as used in these instructions means to deliver a controlled substance to the possession of another person. The term “deliver” means the actual or attempted transfer of a controlled substance to the possession of another person. No consideration for the delivery need exist, and it is not necessary that money or anything of value change hands. The law is concerned with the act of distribution of a controlled substance and does not concern itself with any need for a “sale” to occur.

INSTRUCTION NO. 7

With respect to the question of the defendant's guilt for the offenses charged in the Indictment, the government is not required to prove the amount or quantity of actual (pure) methamphetamine as charged in the Indictment. The government need only prove beyond a reasonable doubt that there was a detectable amount of methamphetamine.

If you find the defendant guilty of an offense charged in the Indictment, however, you must determine whether the offense involved a mixture or substance containing a detectable amount of methamphetamine or if it involved actual (pure) methamphetamine.

If you determine the offense involved a mixture of methamphetamine, you will need to determine if the quantity was: (1) 50 grams or more; or (2) less than 50 grams.

If you determine the offense involved actual (pure) methamphetamine, you will need to determine if the quantity involved was: (1) 50 grams or more; (2) 5 grams or more but less than 50 grams; or (3) less than 5 grams.

The government has the burden of proof to establish a quantity beyond a reasonable doubt. For your information, one ounce equals 28.35 grams, one pound equals 453.6 grams, and one kilogram equals 1,000 grams.

INSTRUCTION NO. 8

The government is not required to prove that the defendant knew that his acts or omissions were unlawful. An act is done knowingly if the defendant is aware of the act and does not act through ignorance, mistake or accident.

Knowledge may be proved like anything else. You may consider any acts done or statements made by the defendant in connection with the offense, and all the facts and circumstances in evidence which may aid in a determination of the defendant's knowledge.

Intent may be proven by circumstantial evidence. It rarely can be established by other means. Although witnesses may see or hear and thus be able to give direct evidence of what a person does or fails to do, there can be no eyewitness account of the state of mind with which the acts were done or omitted. But what a defendant does or fails to do may indicate intent or lack of intent to commit an offense.

You may consider it reasonable to draw the inference and find that a person intends the natural and probable consequences of acts knowingly done, but you are not required to do so. It is entirely up to you to decide what facts to find from the evidence.

INSTRUCTION NO. 9

It will be your duty as jurors to decide from the evidence whether the defendant is guilty or not guilty of the crimes charged. From the evidence, you will decide what the facts are. You are entitled to consider that evidence in the light of your own observations and experiences in the affairs of life. You may use reason and common sense to draw deductions or conclusions from facts which the evidence has established. You will then apply those facts to the law which I give you in my instructions. You are the sole judges of the facts, but you must follow the law as stated in my instructions, whether you agree with it or not.

Do not allow sympathy or prejudice to influence you. The law demands of you a just verdict, unaffected by anything except the evidence, your common sense, and the law as I give it to you.

You should not take anything I may say or do during the trial as indicating what I think of the evidence or what I think your verdicts should be.

Finally, please remember that only this defendant, not anyone else, is on trial here, and that the defendant is on trial only for the crimes charged, not for anything else.

INSTRUCTION NO. 10

I have mentioned the word “evidence.” The “evidence” in this case consists of the following: the testimony of the witnesses, the documents and other things received as exhibits, and the facts that have been stipulated to—that is, formally agreed to by the parties.

Certain things are not evidence. I will list those things for you now:

1. The lawyers’ statements, arguments, questions and comments are not evidence.
2. Anything that jurors, the attorneys, or the judge might have said during the jury selection process is not evidence.
3. Objections are not evidence. The parties have a right to object when they believe something is improper. You should not be influenced by objections. If I sustained an objection to a question, you must ignore the question and must not try to guess what the answer might have been.
4. Testimony that I strike from the record, or tell you to disregard, is not evidence and must not be considered.
5. Anything you see or hear about this case outside the courtroom is not evidence.

During the trial, documents and objects may be referred to but not admitted into evidence. In such a case, these items will not be available to you in the jury room during deliberations.

Furthermore, a particular item of evidence is sometimes received for a limited purpose only. That is, it can be used by you only for one particular purpose, and not for any other purpose. I will tell you if this occurs and instruct you on the purposes for which the item can and cannot be used.

INSTRUCTION NO. 11

There are two types of evidence from which you may properly find the truth as to the facts of this case: direct evidence and circumstantial evidence. Direct evidence is the evidence of the witnesses to a fact or facts of which they have knowledge by means of their senses. The other is circumstantial evidence—the proof of a chain of circumstances pointing to the existence or nonexistence of certain facts. The law makes no distinction between direct and circumstantial evidence. You should give all evidence the weight and value you believe it is entitled to receive.

INSTRUCTION NO. 12

The jurors are the sole judges of the weight and credibility of the testimony, and the value to be given to the testimony, of each witness who testifies in this case. In deciding what the facts are, you may have to decide what testimony you believe and what testimony you do not believe. You may believe all of what a witness says, or only part of it, or none of it.

In deciding what testimony of any witness to believe, consider the witness's intelligence, the opportunity the witness had to have seen or heard the things testified about, the witness's memory, any motives that witness may have for testifying a certain way, the manner of the witness while testifying, whether that witness said something different at an earlier time, the general reasonableness of the testimony, and the extent to which the testimony is consistent with other evidence that you believe.

In deciding whether to believe a witness, keep in mind that people sometimes hear or see things differently and sometimes forget things. You need to consider, therefore, whether a contradiction is an innocent misrecollection or lapse of memory or an intentional falsehood, and that may depend on whether it has to do with an important fact or only a small detail.

If the defendant chooses to testify, you should judge that testimony in the same manner as you judge the testimony of any other witness.

INSTRUCTION NO. 13

In the previous instruction, I instructed you generally on the credibility of witnesses. I now give you this further instruction on how the credibility of a witness can be “impeached” and how you are to consider the testimony of certain witnesses.

A witness may be discredited or impeached by contradictory evidence; by showing that the witness testified falsely concerning a material matter; by showing that the witness has a motive to be untruthful; or by evidence that at some other time the witness has said or done something, or has failed to say or do something, that is inconsistent with the witness’s present testimony.

You may hear evidence that some witnesses were once convicted of a crime. If so, you may use that evidence only to help you decide whether you believe those witnesses and how much weight to give their testimony.

You may hear evidence that certain witnesses who stated that they participated in a crime or crimes charged against the defendant. If so, their testimony would be received in evidence and may be considered by you. You may give their testimony such weight as you think it deserves. Whether or not their testimony may be influenced by their desire to please the government or to strike a good bargain with the government with respect to their own situation will be for you to determine.

INSTRUCTION NO. 14

You may hear testimony from persons who, by knowledge, skill, training, education, or experience, have become expert in some field. They are permitted to give their opinions on matters in that field and may also state the reasons for their opinions.

Such testimony should be considered just like any other testimony. You may accept or reject the testimony of these witnesses just like any other testimony. After considering such a witness's education and experience, the reasons given for the opinion, and all the other evidence in the case, you may give that witness' testimony whatever weight, if any, you think it deserves.

INSTRUCTION NO. 15

Exhibits will be admitted into evidence and are to be considered along with all of the other evidence to assist you in reaching your verdicts. During your deliberations, you are not to tamper with the exhibits or their contents, and you should leave the exhibits in the jury room in the same condition as you received them.

INSTRUCTION NO. 16

You may hear audio and video recordings of conversations. These conversations were legally recorded, and you may consider the recordings just like any other evidence. Some portions of the recordings may have been muted or skipped. Do not attempt to guess at what occurred during the muted or skipped portions of the recordings.

INSTRUCTION NO. 17

You may see transcripts of recordings, which also identify the speakers engaged in the conversations.

The transcript is for the limited purpose of helping you follow the conversation as you listen to the recording, and also to help you keep track of the speakers. Differences in meaning between what you hear in the recording and read in the transcript may be caused by such things as the inflection in a speaker's voice. It is what you hear, however, and now what you read, that is the evidence.

Whether the transcript correctly or incorrectly reflects the conversation or the identity of the speakers is entirely for you to decide based upon what you hear on the recording and what you have heard here about the preparation of the transcript, and upon your own examination of the transcript in relation to what you hear on the recording. If you decide that the transcript is in any respect incorrect or unreliable, you should disregard it to that extent.

INSTRUCTION NO. 18

You may hear testimony that the defendant made a statement to law enforcement.

It is for you to decide:

First, whether the defendant made the statement, and

Second, if so, how much weight you should give to it.

In making these two decisions, you should consider all of the evidence, including the circumstances under which the statement may have been made.

INSTRUCTION NO. 19

Reasonable doubt is doubt based upon reason and common sense, and not doubt based on speculation. A reasonable doubt may arise from careful and impartial consideration of all the evidence, or from a lack of evidence. Proof beyond a reasonable doubt is proof of such a convincing character that a reasonable person, after careful consideration, would not hesitate to rely and act upon that proof in life's most important decisions. Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant's guilt. Proof beyond a reasonable doubt does not mean proof beyond all possible doubt.

INSTRUCTION NO. 20

At the end of the trial, you must make your decisions based on what you recall of the evidence. You will not have a written transcript to consult. Therefore, you must pay close attention to the testimony as it is given.

If you wish, you may take notes during the presentation of evidence to help you remember what witnesses said. If you do take notes, please keep them to yourself until you and your fellow jurors go to the jury room to decide the case. Do not let note-taking distract you so that you do not hear other answers by the witnesses.

During deliberations, in any conflict between your notes, a fellow juror's notes, and your memory, your memory must prevail. Notes sometimes contain the mental impressions of the note taker and can be used only to help you recollect what the testimony was.

We have given each juror an envelope with a pad and pen in it. The envelopes are numbered according to your seat in the jury box. When you leave for breaks or at night, please put your pad and pen in the envelope and leave the envelope on your chair. Your notes will be secured, and they will not be read by anyone. At the end of trial and your deliberations, your notes should be left in the jury room for destruction.

INSTRUCTION NO. 21

During the trial, it may be necessary for me to talk with the lawyers out of the hearing of the jury, either by having a bench conference while the jury is present in the courtroom or by calling a recess. If a bench conference is held in the courtroom, we will switch on what we refer to as “white noise” so that the jurors cannot hear what the lawyers and I are saying. While bench conferences are being conducted, you should feel free to stand and stretch and visit among yourselves about anything except the case.

INSTRUCTION NO. 22

The trial will proceed in the following manner:

First, the attorney for the government will make an opening statement. Next, the attorney for the defendant may, but does not have to, make an opening statement. An opening statement is not evidence but is simply a summary of what the attorneys expect the evidence to be.

The government will then present its evidence, and the attorney for the defendant may cross-examine the government's witnesses. Following the government's case, the defendant may, but does not have to, present evidence, testify, or call other witnesses. If the defendant calls witnesses, the attorney for the government may cross-examine them.

After the presentation of evidence is completed, the attorneys will make their closing arguments to summarize and interpret the evidence for you. As with opening statements, closing arguments are not evidence. After that, the court will instruct you further regarding your deliberations, and you will retire to deliberate on your verdicts.

INSTRUCTION NO. 23

During the course of the trial, to ensure fairness, you as jurors must obey the following rules.

First, do not talk among yourselves about this case, or about anyone involved with it, until the end of the case when you go to the jury room to decide on your verdicts.

Second, do not talk with anyone else about this case, or about anyone involved with it, until the trial has ended and you have been discharged as jurors.

Third, do not use any electronic device or media, such as the telephone, a cell or smart phone, Blackberry, PDA, computer, the Internet, any Internet service, any text or instant messaging service, any Internet chat room, blog, or website such as Facebook, YouTube, or X (formerly Twitter), to communicate to anyone any information about this case, or your opinions concerning it, until the trial has ended and you have been discharged as jurors.

Fourth, when you are outside the courtroom, do not let anyone tell you anything about the case, or about anyone involved with it, until the trial has ended and your verdicts have been accepted by me. If someone should try to talk with you about the case during the trial, please report it to me through the Court Security Officer.

Fifth, during the trial, you should not talk with or speak to any of the parties, lawyers or witnesses involved in this case—you should not even pass the time of day with any of them. It is important not only that you do justice in this case, but that you also give the appearance of doing justice. If a person from one side of the case sees you talking to a person from the other side—even if it is simply to pass the time of day—an unwarranted and unnecessary suspicion about your fairness might be aroused. If any lawyer, party, or witness does not speak to you when you pass in the hall or the like, it is because they are not supposed to talk or visit with you.

Sixth, do not read any news stories or articles about the case, or about anyone involved with it, or listen to any radio or television reports about the case, or about

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INSTRUCTION NO. 23 (Cont'd)

anyone involved with it. In fact, until the trial is over, I suggest that you avoid reading any newspapers or news journals at all, and avoid listening to any TV or radio newscasts at all. I do not know whether there might be any news reports of this case, but, if there are, you might inadvertently find yourself reading or listening to something before you could do anything about it. If you want, you can have your spouse or a friend clip out any stories and set them aside to give you after the trial is over. I can assure you, however, that by the time you have heard the evidence in this case you will know more about the matter than anyone will learn through the news media.

Seventh, do not do any research or make any investigation about the case on your own. Do not consult any reference materials such as the Internet, books, magazines, dictionaries, or encyclopedias. Do not contact anyone to ask them questions about issues that may arise in this case. Remember, you are not permitted to talk to anyone (except your fellow jurors) about this case or anyone involved with it until the trial has ended and I have discharged you as jurors.

Eighth, do not make up your mind during the trial about what the verdicts should be. Keep an open mind until after you have gone to the jury room to decide the case and you and your fellow jurors have discussed the evidence.

Dated this _____ day of June, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	FINAL JURY
	)	INSTRUCTIONS
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Members of the Jury:

The instructions I gave you at the beginning of the trial and during the trial remain in effect. I will now give you some additional instructions before you begin your deliberations.

You must, of course, continue to follow the instructions I gave you earlier, as well as those I give you now. You must not single out some instructions and ignore others, because all are important. This is true even though the instructions I gave you at the beginning of and during trial are not repeated here.

INSTRUCTION NO. 24

In conducting your deliberations and returning your verdicts, there are certain rules you must follow. I will list those rules for you now.

First, when you go to the jury room, you must select one of your members as your foreperson. That person will preside over your discussions and speak for you here in court.

Second, it is your duty, as jurors, to discuss this case with one another in the jury room. You should try to reach an agreement if you can do so without violence to individual judgment, because your verdicts—whether guilty or not guilty—must be unanimous. Each of you must make your own conscientious decisions, but only after you have considered all the evidence, discussed it fully with your fellow jurors and listened to the views of your fellow jurors. Do not be afraid to change your opinions if your discussion persuades you that you should. But do not come to a decision simply because other jurors think it is right or simply to reach your verdicts.

Third, if you find the defendant guilty, the sentence to be imposed is my responsibility. You may not consider punishment in any way when deciding whether the government has proved its case beyond a reasonable doubt.

Fourth, if you need to communicate with me during your deliberations, you may send a note to me through the Court Security Officer, signed by one or more jurors. I will respond as soon as possible either in writing or orally in open court.

Remember that you should not tell anyone—including me—how your votes stand numerically.

Fifth, your verdicts must be based solely on the evidence and on the law that I have given to you in my instructions. Each verdict, whether guilty or not guilty, must be unanimous. Nothing I have said or done is intended to suggest what your verdicts should be—that will be entirely for you to decide.

INSTRUCTION NO. 25

Attached to these instructions you will find Verdict Forms and Interrogatory Forms. The Verdict Forms and Interrogatory Forms are simply the written notices of the decisions that you reach in this case. The answers to the Verdict Forms and Interrogatory Forms must be the unanimous decisions of the Jury.

You will take the Verdict Forms and Interrogatory Forms to the jury room, and when you have completed your deliberations and each of you has agreed to the answers to the Verdict Forms and Interrogatory Forms your foreperson will fill out the Verdict Forms and Interrogatory Forms, sign and date them, and advise the Court Security Officer that you are ready to return to the courtroom. Your foreperson should place the signed Verdict Forms and Interrogatory Forms in the blue folder, which the court will provide you, and then your foreperson will bring the blue folder when returning to the courtroom.

Finally, members of the Jury, take this case and give it your most careful consideration, and then without fear or favor, prejudice or bias of any kind, return the Verdict Forms and Interrogatory Forms in accord with the evidence and these instructions. Dated this ____ day of _____, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 1
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Count 1 – Distribution of a Controlled Substance

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution of a controlled
substance, as charged in Count 1 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 1, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then go on to answer the Verdict Form for Count 2. Do not answer the interrogatory question for Count 1.

If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 1, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 1.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 1
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 1 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 1 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance,

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INTERROGATORY FORM FOR COUNT 1 (Cont'd)

then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

Count 2.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 2
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Count 2 – Distribution of a Controlled Substance

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution of a controlled
substance, as charged in Count 2 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 2, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then go on to answer the Verdict Form for Count 3. Do not answer the interrogatory question for Count 2.

If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 2, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 2.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 2
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 2 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 2 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

(CONTINUED)
INTERROGATORY FORM FOR COUNT 2 (Cont'd)

Count 3.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 3
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Count 3 – Distribution of a Controlled Substance

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution of a controlled
substance, as charged in Count 3 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 3, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then go on to answer the Verdict Form for Count 4. Do not answer the interrogatory question for Count 3.

If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 3, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 3.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 3
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 3 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 3 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance,

(CONTINUED)

INTERROGATORY FORM FOR COUNT 3 (Cont'd)

then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

Count 4.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 4
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Count 4 – Distribution of a Controlled Substance

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution of a controlled
substance, as charged in Count 4 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 4, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then go on to answer the Verdict Form for Count 5. Do not answer the interrogatory question for Count 4.

If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 4, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 4.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 4
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 4 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 4 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

(CONTINUED)
INTERROGATORY FORM FOR COUNT 4 (Cont'd)

Count 5.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 5
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

**Count 5 – Distribution, or Aiding and Abetting the Distribution, of a Controlled
Substance**

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution, or aiding and
abetting the distribution, of a controlled substance, as charged in Count 5 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 5, have
your foreperson write “not guilty” in the above blank space, and sign and
date this Verdict Form. Then go on to answer the Verdict Form for Count 6.
Do not answer the interrogatory question for Count 5.

If you unanimously and beyond a reasonable doubt find the defendant guilty
of Count 5, have your foreperson write “guilty” in the above blank space and
sign and date this Verdict Form. Then, go on to answer the Interrogatory
Form for Count 5.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 5
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 5 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 5 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

(CONTINUED)
INTERROGATORY FORM FOR COUNT 5 (Cont'd)

Count 6.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 6
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Count 6 – Distribution of a Controlled Substance

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution of a controlled
substance, as charged in Count 6 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 6, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then go on to answer the Verdict Form for Count 7. Do not answer the interrogatory question for Count 6.

If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 6, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 6.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 6
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 6 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 6 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved beyond a reasonable doubt. Then go on to answer the Verdict Form for

(CONTINUED)
INTERROGATORY FORM FOR COUNT 6 (Cont'd)

Count 7.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 7
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

**Count 7 – Distribution, or Aiding and Abetting the Distribution, of a Controlled
Substance**

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution, or aiding and
abetting the distribution, of a controlled substance, as charged in Count 7 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 7, have
your foreperson write “not guilty” in the above blank space, and sign and
date this Verdict Form. Then go on to answer the Verdict Form for Count 8.
Do not answer the interrogatory question for Count 7.

If you unanimously and beyond a reasonable doubt find the defendant guilty
of Count 7, have your foreperson write “guilty” in the above blank space and
sign and date this Verdict Form. Then, go on to answer the Interrogatory
Form for Count 7.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 7
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 7 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 7 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____ A mixture or substance containing a detectable amount of methamphetamine

_____ 50 grams or more

_____ less than 50 grams

_____ Actual (pure) methamphetamine

_____ 50 grams or more

_____ At least 5 grams but less than 50 grams

_____ less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved

(CONTINUED)

INTERROGATORY FORM FOR COUNT 7 (Cont'd)

beyond a reasonable doubt. Then go on to answer the Verdict Form for Count 8.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	VERDICT FORM
	)	FOR COUNT 8
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

**Count 8 – Distribution, or Aiding and Abetting the Distribution, of a Controlled
Substance**

We, the Jury, unanimously find the defendant, JONATHAN QUINN CARTER,
_____ [Not Guilty/Guilty] of the crime of distribution, or aiding and
abetting the distribution, of a controlled substance, as charged in Count 5 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 8, have
your foreperson write “not guilty” in the above blank space, and sign and
date this Verdict Form. Do not answer the interrogatory question for
Count 8.

If you unanimously and beyond a reasonable doubt find the defendant guilty
of Count 8, have your foreperson write “guilty” in the above blank space and
sign and date this Verdict Form. Then, go on to answer the Interrogatory
Form for Count 8.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	INTERROGATORY FORM
	)	FOR COUNT 8
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

If you found the defendant guilty of the crime charged in Count 8 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 8 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the drug type and quantity involved in the offense was:

_____	A mixture or substance containing a detectable amount of methamphetamine
_____	50 grams or more
_____	less than 50 grams
_____	Actual (pure) methamphetamine
_____	50 grams or more
_____	At least 5 grams but less than 50 grams
_____	less than 5 grams

NOTE: You may place a check mark (✓) on either, or both, a mixture or substance containing a detectable amount of methamphetamine and/or actual (pure) methamphetamine. If you check the box for any substance, then check the highest drug quantity you found the government proved

(CONTINUED)
INTERROGATORY FORM FOR COUNT 8 (Cont'd)

beyond a reasonable doubt.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	POST-VERDICT JURY
	)	INSTRUCTION
JONATHAN QUINN CARTER,	)	
	)	
Defendant.	)	

Members of the Jury:

You have one more task to perform. I must ask you to render a special verdict as to whether the defendant has been convicted of a serious drug felony, as alleged in the Indictment.

INSTRUCTION NO. 26

The Indictment alleges that, before the defendant committed the offenses charged in the Indictment, the defendant was convicted of a serious drug felony, specifically, defendant was convicted in the United States District Court for the Northern District of Iowa, in Case No. 07-CR-00093-LRR, of Possession with Intent to Distribute 8.04 grams of Cocaine Base, on or about July 2, 2008. I will refer to this as defendant's "prior drug conviction."

To establish defendant's previous conviction for a serious drug felony, the government must prove two facts, which are:

One, the defendant served a term of imprisonment of more than 12 months for his prior drug conviction; and

Two, the defendant was released from serving any term of imprisonment for that conviction within 15 years of the commencement of the offense(s) charged in the Indictment that you have found defendant guilty of.

The term "imprisonment," as used in these instructions, refers to any time the defendant was in a correctional facility such as a prison or jail and does not include any time spent on probation, parole, or serving a suspended sentence.

The government must prove both of these facts beyond a reasonable doubt; otherwise, you must find the government has not established the prior drug conviction.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 25-CR-73-CJW
	)	
vs.	)	SPECIAL VERDICT FORM
	)	FOR SERIOUS DRUG
JONATHAN QUINN CARTER,	)	FELONY
	)	
Defendant.	)	

We, the Jury, unanimously find beyond a reasonable doubt the following:

Question 1: The defendant, Jonathan Quinn Carter, served a term of imprisonment of more than 12 months for his prior drug conviction.

_____ Yes _____ No

Question 2: The defendant, Jonathan Quinn Carter, was released from serving any term of imprisonment for his prior drug conviction within 15 years of the commencement of the offense charged in each count of the Indictment:

Count 1:	_____ Yes	_____ No
Count 2:	_____ Yes	_____ No
Count 3:	_____ Yes	_____ No
Count 4:	_____ Yes	_____ No
Count 5:	_____ Yes	_____ No

(CONTINUED)

SPECIAL VERDICT FORM FOR SERIOUS DRUG FELONY (Cont'd)

Count 6: _____ Yes _____ No
Count 7: _____ Yes _____ No
Count 8: _____ Yes _____ No

NOTE: Answer by putting an “X” in the space provided next to the word “Yes” or “No” for each question. The foreperson must sign and date this Special Verdict Form below. Then, go on to answer the Special Verdict Form related to forfeiture.

FOREPERSON

DATE