

## Expert Witness Re: Drug Trafficking <sup>1</sup>

You will recall that (*specify*) testified about

*Select appropriate alternative(s):*

the roles people play in the sale of drugs <sup>2</sup>

the way in which drugs are packaged <sup>3</sup>

the terminology people use in the sale of drugs <sup>4</sup>

You should evaluate that testimony for believability and accuracy just as you would the testimony of any other witness. You may accept it or reject it, in whole or in part, just as you may with respect to the testimony of any other witness.

If you accept the testimony, you may consider it along with all the other evidence in the case in determining whether the People have proven the defendant's guilt beyond a reasonable doubt. Standing alone, however, such testimony is not sufficient to prove that the defendant is guilty.

1. As appropriate, the Court may submit this charge along with the general charge relating to an expert witness.
2. See *People v Smith*, 2 NY3d 8 [2004]; *People v Gonzalez*, 99 NY2d 76 [2002]; *People v Brown*, 97 NY2d 500 [2002].
3. See *People v Hicks*, 2 NY3d 750 [2004].
4. See *People v Brown*, *supra*.