**STATE OF ILLINOIS**

**IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT**

**COUNTY OF DU PAGE**

PEOPLE OF THE STATE OF ILLINOIS )

PLAINTIFF, )

)

) CRIMINAL

VS. ) No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

)

)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

DEFENDANT. )

**MOTION IN LIMINE**

NOW COMES the defendant, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, by his attorney, , and prays that this Court prohibit the State from eliciting testimony or submitting evidence regarding the Defendant's prior convictions. In support hereof, it is stated as follows:

1. The Defendant is charged with the offense of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

2. The Defendant has evidence critical to his case to offer.

3. The Defendant verily believes that should he testify, the State will attempt to impeach his testimony with his prior convictions.

4. The degree of prejudice to flow from said introduction will outweigh its probative relevance.

5. The introduction of said convictions will, in effect, keep the Defendant from taking the stand in his own defense.

6. The introduction of said convictions will prevent the Defendant from getting a fair trial in violation of his due process rights under the Fourteenth Amendment of the United States Constitution.

WHEREFORE, the Defendant prays this Court grant said motion and prohibit said testimony regarding the Defendant's prior convictions from being introduced.

By\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney for the Defendant