

14-330. Harassment; essential elements.

For you to find the defendant guilty of harassment as [charged in Count _____]¹, the state must prove to your satisfaction beyond a reasonable doubt each of the following elements of the crime:

1. The defendant maliciously pursued a pattern of conduct that was intended to [annoy] [seriously alarm] [or] [terrorize]² _____ (*name of victim*);

2. A reasonable person would have suffered substantial emotional distress as a result of the defendant's actions;

3. The defendant's conduct served no lawful purpose;

4. This happened in New Mexico on or about the _____ day of

_____, _____.

USE NOTE

1. Insert the count number if more than one count is charged.

2. Use only the applicable bracketed alternatives.

[Adopted, effective February 1, 1995.]