

14-2224. Assisting escape; essential elements.

For you to find the defendant guilty of assisting escape [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. _____ (*name of prisoner*) was in [custody of _____ (*name of peace officer*)]²
[confinement at _____³];
2. _____ (*name of prisoner*) escaped;
3. The defendant aided the escape of _____ (*name of prisoner*);
4. This happened in New Mexico on or about the _____ day of _____, _____.

USE NOTES

1. Insert the count number if more than one count is charged.
2. Use only the applicable bracketed element established by the evidence.
3. Describe place of custody or confinement.