

14-2227. Assault on a jail; essential elements.

For you to find the defendant guilty of assault on a jail [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 assaulted² or attacked _____,³ [a jail]⁴ [a prison] [place of confinement of prisoners];
2. 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. If the jury asks for a definition of "assaulted," use a non-law dictionary definition.
3. Identify the place of the attack.
4. Use only the applicable bracketed element established by the evidence.