

14-2251. Aggravated assault by a prisoner; attempting to cause great bodily harm; essential elements.

For you to find the defendant guilty of aggravated assault by a prisoner attempting to cause great bodily harm [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 [tried to]² _____ (*describe act and insert name of victim*)³ who was an [officer] [employee] [visitor]⁴ at _____⁵;
2. The defendant intended to cause great bodily harm⁶ to _____ (*name of officer, employee or visitor*);
3. At the time, the defendant was confined at _____⁵;
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 bracketed material only if no battery occurs.
3. Use laymen's language to describe the touching or application of force.
4. Use only the applicable bracketed element established by the evidence.
5. Identify place of custody or confinement.
6. The definition of "great bodily harm," UJI 14-131, must also be given.