

14-2252. Aggravated assault by a prisoner; causing great bodily harm; essential elements.

For you to find the defendant guilty of aggravated assault by a prisoner causing 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 _____ (*describe act and insert name of victim*)² who was an [officer]³ [employee] [visitor] at _____⁴;
2. The defendant caused great bodily harm⁵ to _____ (*name of officer, employee or visitor*);
3. At the time, the defendant was confined at _____⁴;
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 laymen's language to describe the touching or application of force.
3. Use only the applicable bracketed element established by the evidence.
4. Identify the place of custody or confinement.
5. The definition of "great bodily harm," UJI 14-131, must also be given.