

222.15. WILLFUL AND WANTON INJURY TO REAL PROPERTY.
MISDEMEANOR.

The defendant has been charged with willful and wanton [damage to] [injury to] [destruction of] real property.

For you to find the defendant guilty of this offense, the State must prove two things beyond a reasonable doubt:

First, that the defendant [damaged] [injured] [destroyed] (*describe property*) of (*name owner*). (*Describe property*) is real property.¹

And Second, that the defendant did this willfully and wantonly; that is, intentionally and without justification or excuse and without regard for the consequences or the rights of others.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date, the defendant willfully and wantonly [damaged] [injured] [destroyed] (*describe real property*), it would be your duty to return a verdict of guilty. If you do not so find or have a reasonable doubt as to one or more of these things, it would be your duty to return a verdict of not guilty.

1. N.C. Gen. Stat. § 12-3(6) defines “real property” as being coextensive with lands, tenements, and hereditaments.