

222.98. INJURING A MANUFACTURING FACILITY. FELONY.

The defendant has been charged with injuring a manufacturing facility.

For you to find the defendant guilty of injuring a manufacturing facility, the State must prove two things beyond a reasonable doubt.

First, that the defendant [[stopped] [obstructed] [impaired] [weakened] [destroyed] [injured] [otherwise damaged]] [attempted to [stop] [obstruct] [impair] [weaken] [destroy] [injure] [otherwise damage]] the property or equipment¹ of a manufacturing facility.²

And Second, that the defendant acted knowingly and willfully. Willfully means intentionally and without justification or excuse.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant knowingly and willfully [[stopped] [obstructed] [impaired] [weakened] [destroyed] [injured] [otherwise damaged]] [attempted to [stop] [obstruct] [impair] [weaken] [destroy] [injure] [otherwise damage]] the [property] [equipment] of a manufacturing facility, it would be your duty to return a verdict of guilty. If you do not so find or have reasonable doubt as to one or more of these things, it would be your duty to return a verdict of not guilty.

1. The term “property or equipment” includes hardware, software, or other digital infrastructure necessary for the operations of the manufacturing facility. N.C. Gen. Stat. § 14-150.3(a).

2. The term “manufacturing facility” means a facility used for the lawful production or manufacturing of goods. N.C. Gen. Stat. § 14-150.3(a).