

PREPARATION TO COMMIT BREAKING OR ENTERING INTO MOTOR VEHICLES- [BUYING] [SELLING] [TRANSFERRING] A MOTOR VEHICLE [MASTER KEY] [MANIPULATIVE KEY] [KEY CUTTING DEVICE] [LOCK-PICKING DEVICE] [HOT WIRING DEVICE]. G.S. 14-56.4(c). MISDEMEANOR.

The defendant has been charged with preparation to commit breaking or entering into a motor vehicle by [buying] [selling] [transferring] a motor vehicle [master key]¹ [manipulative key]² [key cutting device] [lock-picking device] [hot wiring device].

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

First, that the defendant willfully [bought] [sold] [transferred] a motor vehicle [master key]¹ [manipulative key]² [key cutting device] [lock-picking device] [hot wiring device].

Second, that the defendant [bought] [sold] [transferred] this device with the intent to commit a(n) [felony] [larceny] [unauthorized use of a motor propelled conveyance]. (Description of the crime) is a [felony] [larceny] [unauthorized use of a motor propelled

¹A "master key" means a key that operates all the keyed locks or cylinders in a similar type or group of locks.

²A "manipulative key" means a key, device or instrument, other than a key that is designed to operate a specific lock, that can be variably positioned and manipulated in a vehicle keyway to operate a lock or cylinder or multiple locks or cylinders, including a wiggle key, jiggle key, or rocket key.

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conveyance]. A (description of the vehicle) is a motor propelled conveyance.

And Third, that the motor vehicle [master key] [manipulative key] [key cutting device] [lock-picking device] [hot wiring device] was [[designed to] [capable of]] [open(ing) the [door] [trunk] of any motor vehicle] [start(ing) the engine of a motor vehicle].

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant willfully [bought] [sold] [transferred] a motor vehicle [master key] [manipulative key] [key cutting device] [lock picking device] [hot wiring device] with the intent to commit a [felony] [larceny] [unauthorized use of a motor propelled conveyance], that the motor vehicle [master key] [manipulative key] [key cutting device] [lock-picking device] [hot wiring device] was [[designed to] [capable of]] [open(ing) the [door] [trunk] of any motor vehicle] [start(ing) the engine of a motor vehicle], 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.