

215.91 COMMUNICATING A THREAT OF MASS VIOLENCE AT A PLACE OF RELIGIOUS WORSHIP. N.C. Gen. Stat. § 14-277.7.

The defendant has been charged with communicating a threat of mass violence at a place of religious worship.

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

First, that the defendant, by any means of communication to any [person] [group of persons], threatened to commit an act of mass violence, that is (*describe act of alleged mass violence*) at (*describe place*).

Second, that (*describe threat of alleged mass violence*) was an act of mass violence. Mass violence is defined as a physical injury that a reasonable person would conclude could lead to permanent injury, including mental or emotional injury, or death of two or more people.<sup>1</sup>

And Third, that (*describe place*) was a place of religious worship.<sup>2</sup>

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant communicated, by any means, to [another person] (or) [group of persons] that the defendant was going to commit an act of mass violence at a place of religious worship, 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.

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1 N.C. Gen. Stat. § 14-277.5.

2 N.C. Gen. Stat. § 14-277.7 defines place of religious worship as “any church, chapel, meetinghouse, synagogue, temple, longhouse, or mosque, or other building that is regularly used, and clearly identifiable, as a place of worship.”

