

[WILLFUL] [MALICIOUS] INJURY TO [RENTED] [HIRED] PERSONAL  
PROPERTY. G.S. 14-165.<sup>1</sup> MISDEMEANOR.

The defendant has been charged with willfully or maliciously  
injuring [rented] [hired] personal property.

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

First, that the defendant [rented] [hired] (*describe  
personal property*) from the victim.

Second, that the defendant [injured] [damaged] the property.

Third, that he did this willfully, that is, intentionally  
and without justification or excuse; (or maliciously, that is,  
with animosity, hatred or ill will.)

And Fourth, that he did this by [using] [driving] the  
property in violation of a law of North Carolina. (*Name and  
summarize law violated*) is a law of North Carolina.

If you find from the evidence beyond a reasonable doubt that  
on or about the alleged date the defendant had [rented] [hired]  
(*describe personal property*) from the victim, and the defendant,  
willfully (or maliciously) [injured] [damaged] the property while  
[using] (or) [driving] it in violation of (*name or describe law*),  
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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<sup>1</sup>The statute punishes personally caused injury as well as permitting  
others to cause injury. This instruction assumes the former (personally  
causing injury), but with minor modifications can be adapted to the latter.

