

CYBERSTALKING--FALSE STATEMENT. G.S. 14-196.3(b)(3).
MISDEMEANOR.

The defendant has been charged with cyberstalking.

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

First, that the defendant communicated to the victim by way of [electronic mail]¹ [electronic communication].²

Second, that the defendant knowingly made a false statement concerning the [death] [injury] [illness] [disfigurement] [indecent conduct] [criminal conduct] of [the victim] [any member of the victim's family] [any member of the victim's household].

And Third, that the defendant communicated to the victim with the intent to [abuse] [annoy] [threaten] [terrify] [harass] [embarrass].

If you find from the evidence beyond a reasonable doubt that on or about the alleged date, the defendant communicated to the victim by way of [electronic mail] [electronic communication] and knowingly made a false statement concerning the [death] [injury] [illness] [disfigurement] [indecent conduct] [criminal conduct] of [the victim] [any member of the victim's family] [any member

¹"Electronic mail" is defined as the transmission of information or communication by the use of the Internet, a computer, a facsimile machine, a pager, a cellular telephone, a video recorder, or other electronic means sent to a person identified by a unique address or address number and received by that person.

²"Electronic communication" is defined as any transfer of signs, signals, writing, images, sounds, data or intelligence of any nature, transmitted in whole or in part by a wire, radio, computer, electromagnetic, photoelectric, or photo-optical system.

CYBERSTALKING--FALSE STATEMENT. G.S. 14-196.3(b)(3).
MISDEMEANOR. (Continued.)

of the victim's household] with the intent to [abuse] [annoy]
[threaten] [terrify] [harass] [embarrass], 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.