

RECKLESS DRIVING--CARELESSLY AND HEEDLESSLY. G.S. 20-140(a).
MISDEMEANOR.

The defendant has been charged with reckless driving.

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

First, that the defendant drove a vehicle upon a [highway] [public vehicular area]. (*Name or describe highway or public vehicular area*) is a [highway] [public vehicular area].¹

And Second, that he drove that vehicle (*describe manner of driving*),² and that in so doing he acted carelessly and heedlessly in willful or wanton disregard of the rights or safety of others.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant drove a vehicle upon a [highway] [public vehicular area] (*describe manner of driving*), and that in so doing he acted carelessly and heedlessly in willful or wanton disregard of the rights or safety of others, it would be your duty to return a verdict of guilty. If you do not so find or if you have a reasonable doubt as to one or both of these things, it would be your duty to return a verdict of not guilty.

¹"Public vehicular area" is defined in G.S. 20-4.01(32).

²This description is necessary to avoid reversible error. Cf. *Ingle v. Transfer Corp.*, 271 N.C. 276 (1967).

