

UNLAWFUL USE OF A [DRIVERS LICENSE] [LEARNER'S PERMIT] [SPECIAL IDENTIFICATION CARD] ISSUED BY THE DIVISION OF MOTOR VEHICLES. G.S. 20-30(a); 20-37.8(b). FELONY.

The defendant has been charged with the unlawful use of a [drivers license] [learners permit] [special identification card] in the [commission] [attempted commission] of a felony.

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

First, that the defendant [presented] [displayed] [used] a [drivers license] [learners permit] [special identification card].

Second, that the [drivers license] [learners permit] [special identification card] contained a false or fictitious name.

Third, that the defendant [presented] [displayed] [used] the document in the [commission] [attempted commission] of a felony. (*Define the underlying felony*).

And Fourth, that the defendant acted knowingly.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant [presented] [displayed] [used] a [drivers license] [learners permit] [special identification card], which the defendant knew to contain a false or fictitious name, in the [commission] [attempted commission] of (*name felony*), 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.

