

PREPARATION TO COMMIT BREAKING OR ENTERING INTO MOTOR VEHICLES-POSSESSION OF A MOTOR VEHICLE [MASTER KEY] [MANIPULATIVE KEY] [LOCK-PICKING DEVICE] [HOT WIRING DEVICE]. G.S. 14-56.4(b). MISDEMEANOR.

The defendant has been charged with preparation to commit breaking or entering into a motor vehicle by possessing a motor vehicle [master key]<sup>1</sup> [manipulative key]<sup>2</sup> [lock-picking device] [hot wiring device].

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

First, that the defendant possessed a motor vehicle [master key]<sup>1</sup> [manipulative key]<sup>2</sup> [lock-picking device] [hot wiring device].

And Second, that the defendant possessed this device with the intent to commit a(n) [felony] [larceny] [unauthorized use] of a motor propelled conveyance. (Description of the crime) is a [felony] [larceny] [unauthorized use of a motor propelled conveyance]. A (description of the vehicle) is a motor propelled conveyance.

---

<sup>1</sup>A "master key" means a key that operates all the keyed locks or cylinders in a similar type or group of locks.

<sup>2</sup>A "manipulative key" means a key, device or instrument, other than a key that is designed to operate a specific lock, that can be variably positioned and manipulated in a vehicle keyway to operate a lock or cylinder or multiple locks or cylinders, including a wiggle key, jiggle key, or rocket key.

PREPARATION TO COMMIT BREAKING OR ENTERING INTO MOTOR VEHICLES-POSSESSION OF A MOTOR VEHICLE [MASTER KEY] [MANIPULATIVE KEY] [LOCK-PICKING DEVICE] [HOT WIRING DEVICE]. G.S. 14-56.4(b). MISDEMEANOR. (Continued).

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant possessed a motor vehicle [master key] [manipulative key] [lock picking device] [hotwiring device] with the intent to commit a(n) [felony] [larceny] [unauthorized use of a motor propelled conveyance], 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.