

[WILLFUL] [MALICIOUS] INJURY TO [RENTED] [HIRED] PERSONAL
PROPERTY. G.S. 14-165.¹ 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.

¹The 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.

