

259.97 [COUNTERFEITING] [SELLING] [LENDING] [PERMITTING USE OF] PHOTO IDENTIFICATION FOR VOTING. FELONY.

The defendant has been charged with [counterfeiting] [selling] [lending] [permitting use of] photo identification for voting.

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

First, that defendant [counterfeited] [sold] [lent] [permitted the use of] a form of photo identification<sup>1</sup>.

Second, that the person receiving this photo identification was not entitled to its use.

And Third, that defendant [counterfeited] [sold] [lent] [permitted the use of] this photo identification for the purposes of voting.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant [counterfeited] [sold] [lent] [permitted the use of] a form of photo identification, to a person not entitled to the use of the photo identification, and that the defendant [counterfeited] [sold] [lent] [permitted the use of] this photo identification for the purposes of voting, 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 more of these things, it would be your duty to return a verdict of not guilty.

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<sup>1</sup> See N.C. Gen. Stat. § 163A-1145.1 for applicable forms of photo identification.

