

POSSESSION OR MANUFACTURE OF CERTAIN FRAUDULENT FORMS OF IDENTIFICATION. G.S. 14-100.1. MISDEMEANOR.

The defendant has been charged with [possessing] [manufacturing] a false or fraudulent form of identification for the purpose of deception, fraud, or other criminal conduct.

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

First, that the defendant knowingly [possessed] [manufactured] a false or fraudulent form of identification.<sup>1</sup>

And Second, that defendant [possessed] [manufactured] the false or fraudulent identification form for the purpose of deception, fraud, or other criminal conduct. [(Describe purpose) would be [deception] [fraud] [criminal conduct]].

If you find from the evidence beyond a reasonable doubt that, on or about the alleged date, the defendant knowingly [possessed] [manufactured] a false or fraudulent form of identification for the purpose of deception, fraud, or other criminal conduct, it would be your duty to return

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<sup>1</sup>"For purposes of this section, a 'form of identification' means any of the following or any replica thereof: (1) [a]n identification card containing a picture, issued by a[n] department, agency, or subdivision of the State of North Carolina, the federal government, or any other state; (2) [a] military identification card containing a picture; (3) [a] passport; [and] (4) [a]n alien registration card containing a picture."

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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.