

220.65 BLACKMAIL - BY ACCUSATION OF CRIME. MISDEMEANOR.

The defendant has been charged with blackmail.

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 [accused] [threatened to accuse] the victim of (*name crime*).¹

And Second, that *he* did this with the intent to gain or extort from the victim [a chattel] [money] [a valuable security]. ((*Name chattel or valuable security*) is a [chattel] [valuable security].)

If you find from the evidence beyond a reasonable doubt that on or about the alleged date, the defendant knowingly [accused] [threatened to accuse] the victim of (*name crime*) with the intent to gain or extort from the victim [a chattel] [money] [a valuable security], 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 both of these things, it would be your duty to return a verdict of not guilty.

1. The statute includes any crime punishable by death or imprisonment in the State's prison.