

N.C.P.I.-Crim. 259.97
[COUNTERFEITING] [SELLING] [LENDING] [PERMITTING USE OF] PHOTO
IDENTIFICATION FOR VOTING. FELONY.
GENERAL CRIMINAL VOLUME
JUNE 2019
N.C. Gen. Stat. § 163A-1389(19)

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 identification¹.

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.

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