

270.80 RECKLESS DRIVING—CARELESSLY AND HEEDLESSLY.  
MISDEMEANOR.

The defendant has been charged with reckless driving.

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

First, that the defendant drove a vehicle upon a [highway] [public vehicular area]. (*Name or describe highway or public vehicular area*) is a [highway] [public vehicular area].<sup>1</sup>

And Second, that he drove that vehicle (*describe manner of driving*),<sup>2</sup> and that in so doing he acted carelessly and heedlessly in willful or wanton disregard of the rights or safety of others.

If you find from the evidence beyond a reasonable doubt that on or about the alleged date the defendant drove a vehicle upon a [highway] [public vehicular area] (*describe manner of driving*), and that in so doing he acted carelessly and heedlessly in willful or wanton disregard of the rights or safety of others, 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 both of these things, it would be your duty to return a verdict of not guilty.

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1. "Public vehicular area" is defined in G.S. 20-4.01(32).

2. This description is necessary to avoid reversible error. *Cf. Ingle v. Transfer Corp.*, 271 N.C. 276 (1967)