**14-2227. Assault on a jail; essential elements.**

For you to find the defendant guilty of assault on a jail [as charged in Count \_\_\_\_\_\_\_\_\_\_]1, the state must prove to your satisfaction beyond a reasonable doubt each of the following elements of the crime:

1. The defendant assaulted2 or attacked \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,3 [a jail]4 [a prison] [place of confinement of prisoners];

2. This happened in New Mexico on or about the \_\_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_.

USE NOTES

1.  Insert the count number if more than one count is charged.

2.  If the jury asks for a definition of "assaulted," use a non-law dictionary definition.

3.  Identify the place of the attack.

4.  Use only the applicable bracketed element established by the evidence.