**14-402. Criminal use of ransom; essential elements.**

For you to find the defendant guilty of criminal use of ransom [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 [received]2 [possessed] [concealed] [disposed of] [money]2 [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*describe property*) which had been delivered for ransom.3

2. At the time the defendant [received]2 [possessed] [concealed] [disposed of] the [money]2 [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*describe property*) [he] [she] knew or believed that it was ransom.

3. 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. Use applicable alternative or alternatives.

3. The definition of "ransom," UJI 14-406 NMRA, must be given after this instruction.

[As amended, effective September 1, 1994.]