

**14-1687. Forgery of a credit card; essential elements.**

For you to find the defendant guilty of forgery of a credit card [as charged in Count \_\_\_\_\_]<sup>1</sup>, the state must prove to your satisfaction beyond a reasonable doubt each of the following elements of the crime:

1. The defendant, without the consent of the issuer<sup>2</sup> of the credit card,<sup>2</sup> [made]<sup>3</sup> [altered] [embossed] a credit card;
2. The defendant intended to deceive or cheat;
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. If the jury requests a definition of "issuer" or "credit card," the statutory definition set forth in Section 30-16-25 NMSA 1978 is to be given.
3. Use applicable alternative. If the jury requests a definition of "made," "altered" or "embossed," the statutory definition set forth in 30-16-31 NMSA 1978 is to be given.