

CR309B Accomplice Liability.

The defendant _____ (NAME) is charged as a party [in Count _____] with committing _____ (CRIME) on or about [DATE]. You cannot convict (him) (her) of this offense unless you find beyond a reasonable doubt, based on the evidence, each of the following elements:

1. That the defendant _____ (NAME):
 - a. [intentionally][knowingly] or [recklessly] solicited, requested, commanded, or encouraged [the principal actor] to commit the crime of (CRIME) as set forth in elements instruction [_____]
 - or
 - b. intentionally aided [the principal actor] to commit the crime of (CRIME) as set forth in elements instruction [_____]
2. And that (NAME);
 - a. [intended that [the principal actor] commit the crime of _____ (CRIME)];
 - b. [was aware that his conduct was reasonably certain to result in [the principal actor] committing the crime of _____ (CRIME)]; or
 - c. [recognized that his conduct could result in [the principal actor] committing the crime of _____ (CRIME) but chose to act anyway.]

After you carefully consider all the evidence in this case, if you are convinced that each and every element has been proven beyond a reasonable doubt, then you must find the defendant GUILTY. On the other hand, if you are not convinced that one or more of these elements has been proven beyond a reasonable doubt, then you must find the defendant NOT GUILTY.