

1 **14-911. Criminal sexual contact; threats of force or coercion; aided or abetted by another;**  
2 **essential elements.**

3 For you to find the defendant guilty of criminal sexual contact when aided or abetted by  
4 another [as charged in Count \_\_\_\_\_]<sup>1</sup>, the state must prove to your satisfaction beyond a  
5 reasonable doubt each of the following elements of the crime:

6 1. The defendant

7 [touched or applied force to the unclothed \_\_\_\_\_<sup>2</sup> of  
8 \_\_\_\_\_ (*name of victim*) without \_\_\_\_\_'s (*name of victim*)  
9 consent;]<sup>3</sup>

10 [OR]

11 [caused \_\_\_\_\_ (*name of victim*) to touch the \_\_\_\_\_<sup>2</sup> of the  
12 defendant;]

13 2. The defendant

14 [used threats of physical force or physical violence against \_\_\_\_\_ (*name*  
15 *of victim or another*);]<sup>3</sup>

16 [OR]

17 [threatened to \_\_\_\_\_<sup>4</sup>;]

18 3. \_\_\_\_\_ (*name of victim*) believed that the defendant would  
19 carry out the threat;

20 4. The defendant acted with the help or encouragement of one or more persons;

21 [5. The defendant's act was unlawful;]<sup>5</sup>

22 6. \_\_\_\_\_ (*name of victim*) was eighteen (18) years of age or older;

