* 1. **Controlled Substance—Manufacture for Purpose**

**of Importation (21 U.S.C. §§ 959, 960(a)(3))**

The defendant is charged in [Count \_\_\_\_\_\_\_ of] the indictment with the manufacture of [*specify controlled substance*] for purposes of unlawful importation in violation of Sections 959 and 960(a)(3) of Title 21 of the United States Code. For the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, the defendant manufactured [*specify controlled substance*] outside of the United States; and

Second, the defendant either intended that the [*specify controlled substance*] be unlawfully brought into the United States [or into waters within a distance of 12 miles off the coast of the United States] or knew that the [*specify controlled substance*] would be unlawfully brought into the United States.