



**MODEL CRIMINAL JURY INSTRUCTIONS COMMITTEE**  
**Meeting Minutes of:**  
**Friday, March 12, 2021**  
**Held via WebEx**

**Attendees:** Justice Samour (Chair), Judge Dailey (Vice Chair), Judge Randall.

**Staff:** Jeremy Beck (Reporter).

### **I. Approval of Minutes**

The Committee approved the minutes for the January 29, 2021, meeting.

### **II. Second-Degree Forgery**

The Committee revisited prior changes to the second-degree forgery instructions in light of *Hoggard v. People*, 2020 CO 54, 465 P.3d 34. The Committee approved these revisions, which involved (1) eliminating a substantive element in the elemental instruction for second-degree forgery, and (2) modifying the definitional instruction of “written instrument” such that it now includes a bracketed paragraph to be given only in second-degree forgery cases.

### **III. Solicitation for Prostitution**

The Committee reviewed its instructions on solicitation for prostitution in light of *People v. Ross*, 2019 COA 79, 482 P.3d 452, and *People v. Ross*, 2021 CO 9, 479 P.3d 910. The Committee directed the Reporter to make certain changes in order to ensure consistency across the instructions for adult and child prostitution; the Committee also requested further elaboration in the comments regarding the opinions by the court of appeals and the supreme court in the *Ross* case. The Committee agreed to finalize these subsequent changes over email.

The Chair adjourned the meeting at 4:45 p.m.