

17.1 FORGERY
§ 831.01, Fla. Stat.

To prove the crime of Forgery, the State must prove the following two elements beyond a reasonable doubt:

1. (Defendant) **falsely [made] [altered] [forged] [counterfeited] a** (document named in charge).
2. (Defendant) **intended to injure or defraud some person or firm.**

It is not necessary that the defendant intended to use (document named in charge) **[himself] [herself] or to profit [himself] [herself] from its use. It is sufficient if [he] [she] intended that some person would use it to injure or defraud.**

Give if victim not named.

Nor is it necessary to prove what person the defendant intended to be injured or defrauded if [he] [she] did intend that some person would be injured or defrauded.

Lesser Included Offenses

FORGERY — 831.01

CATEGORY ONE	CATEGORY TWO	FLA. STAT.	INS. NO.
None			
	Attempt	777.04(1)	5.1

Comment

This instruction was adopted in 1981.