

**FORGERY OF A VEHICLE IDENTIFICATION NUMBER**  
**(Removal of Vehicle Identification Number From Vehicle)**  
**Penal Law § 170.65(2)**  
**(Committed on or After April 1, 1971)**

The (*specify*) count is Forgery of a Vehicle Identification Number.

Under our law, a person is guilty of forgery of a Vehicle Identification Number when he or she removes any such number from a vehicle or component part thereof except as required by the provisions of the vehicle and traffic law.<sup>1</sup>

The following term used in that definition has a special meaning:

A VEHICLE means a motor vehicle [or trailer], [or semi-trailer], [snowmobile], [or aircraft], or any vessel equipped for propulsion by mechanical means or by sail.<sup>2</sup>

In order for you to find the defendant guilty of this crime, the people are required to prove, from all of the evidence in the case, beyond a reasonable doubt, both of the following two elements:

1. That on or about \_\_\_\_ (*date*) \_\_\_\_, in the county of \_\_\_\_ (*county*) \_\_\_\_, the defendant, \_\_\_\_ (*defendant's name*) \_\_\_\_, removed a vehicle identification number from a vehicle or component part thereof; and

---

<sup>1</sup>See Vehicle & Traffic Law article 17 (§ 420, et seq.). See also, e.g., Vehicle & Traffic Law § 429(3).

<sup>2</sup>See Penal Law §10.00(14). See also, Vehicle and Traffic Law §125 for the definition of motor vehicle; VTL §156 for the definition of a trailer, VTL §143 for the definition of a semi-trailer, Parks and Recreation Law §21.05(3) for the definition of a snowmobile.

2. That the defendant was not required to do so by the vehicle and traffic law.

If you find the People have proven beyond a reasonable doubt both of those elements, you must find the defendant guilty of this crime.

If you find the People have not proven beyond a reasonable doubt either one or both of those elements, you must find the defendant not guilty of this crime.