

# Understanding Colorado Statutory Source Notes

by Peggy Lewis and Nate Carr

*When laws are proposed, lawmakers not only study current laws, they also study the history of those laws. Legislative history of a statute also may be important in litigation. That history is documented in source notes. This article provides an overview of the information needed to understand Colorado statutory source notes.*

Source notes, which provide the legislative history of Colorado statutes, are invaluable tools to the legislative researcher. However, some source notes, particularly those predating the 1973 recodification of the Colorado Revised Statutes, can be difficult to interpret and understand. The purpose of this article is to assist the legislative researcher in understanding Colorado's statutory source notes. The article explains the evolution of source notes and provides a key for understanding the elements of a statutory source note.<sup>1</sup>

## Source Note Information and Early History

A source note is a compilation of the legislative history of a particular statute. It immediately follows the text of the statute and serves as a roadmap of the law's history from its enactment. The current source note information found in the Colorado Revised Statutes includes references to prior codifications marked in boldface, followed by the section numbers assigned to the particular provision of law in the respective codifications. The source note for each section of law, as applicable, indicates the year in which the section is added or amended by using the notation "L. year" in boldface; the page of the session laws where the provision is located; and the section of the act where the amendment is found, marked with a section symbol (§).

The source note information was not compiled on an ongoing basis, or even compiled in a format similar to what currently appears in the Colorado Revised Statutes, until the publication of

the Colorado Revised Statutes in 1953. Accordingly, there may be errors in the information within the source notes. J. Myron Jacobstein, a professor of law and the head librarian of the law school at the University of Colorado in 1959, noted:

[A]s the General Assembly had provided for annotations, a complete index, perpetual revision, and for a Revisor of Statutes, the Colorado Revised Statutes of 1953 should be a model of statutory compilation. But something has gone amiss. . . . [A] Wyoming lawyer has available to him a set of tables enabling him to trace any session law since 1877 into the current Wyoming compiled statutes. If lawyers in other states, no larger than Colorado, can have the many advantages available in a good codification, then why cannot lawyers in Colorado?

Until the incorporation of the comparative table referencing the Revised Statutes of Colorado 1908 and subsequent session laws to the Compiled Laws of Colorado 1921, there were no comparative tables available for earlier editions of statutes. Because of this, tracking a section of law from one edition to the other can be accomplished only by using the subject index of each of the editions. Further complicating this research is the fact that entries in the index from one compilation are not necessarily consistent with entries in the next; therefore, some creative thinking is required when tracking provisions across compilations. The thorough researcher will read the front pages of the compilations, browse through the pages of the compilations for a better understanding of the content of each, and examine the session laws to gain insight

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assistance of Molly Otto and Gay Roesch from Legislative Council, Robert Linz from the University of Colorado Law School Library, and Dan Cordova from the Colorado Supreme Court Library in the preparation of this article. This article was reviewed by Jennifer Gilroy, Revisor of Statutes, Office of Legislative Legal Services; Deborah Haskins, Assistant Director, Office of Legislative Legal Services; Kathy Zambrano, Publications Coordinator, Office of Legislative Legal Services; and Mary Sparks, Consultant, Office of Legislative Legal Services (ret.).

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into how the statutes and session laws work together for each version of the state's laws.

Below are two examples of source notes for statutes first enacted in 1872. These examples illustrate how the format changed over the years. Each bit of information is a clue to the different versions of statutes and codes that the state of Colorado has used since 1868. The source notes contain references to years, page numbers, section numbers, codification numbers, statutory section numbers, and then back to session laws. This information will help the researcher find the correct document and determine how the law changed over time. (See the accompanying sidebar entitled "Chart for Decoding Colorado Source Notes" for help decoding Colorado source notes.)

➤ Examples:

**Source:** L. 1872: p. 162, § 1. G.L. § 2145. G.S. § 1317. R.S. 08: § 2498. C.L. § 6544. CSA: C. 63, § 10. CRS 53: § 52-1-10. C.R.S. 1963: § 52-1-10.

**Source:** L. 1872: p. 163, § 4. G.L. § 2148. G.S. § 1320. R.S. 08: § 2501. C.L. § 6547. CSA: C. 63, § 13. CRS 53: § 52-1-13. C.R.S. 1963: § 52-1-13. L. 73: p. 631, § 1.

**Years and Abbreviations in Source Notes**

It is helpful to understand how years are referred to in source notes. Beginning in 1901 and ending in 1999, the year in the source notes was abbreviated as the last two digits of the year. This is seen above in the note beginning with "R.S. 08." The exception to this is the Colorado Revised Statutes from 1963, which is shown in full as "C.R.S. 1963." The process of displaying the year in its entirety began in 2000.

The source note is meaningless unless the legislative researcher has a basic knowledge of the abbreviations commonly used in source notes to represent the various codifications and early compilations of Colorado law over the years.<sup>2</sup> The following is a chronological listing of the publications of Colorado law and the correct citation for each:

- Revised Statutes of Colorado: (1868) R.S. p. \_\_, § \_\_.
- General Laws of Colorado: (1877) G.L. § \_\_.
- General Statutes of Colorado: (1883) G.S. § \_\_.
- Revised Statutes of Colorado: (1908) R.S. 08: § \_\_.
- Compiled Laws of Colorado: (1921) C.L. § \_\_.
- Colorado Statutes Annotated: (1935) CSA: C. \_\_, § \_\_.
- Colorado Revised Statutes 1953: (1953) CRS 53: § \_\_.

Colorado Revised Statutes 1963: (1963) C.R.S. 1963: § \_\_.  
Colorado Revised Statutes: (1973) C.R.S.

**Understanding Early Compilations of Colorado Law**

To research the history of a statute, it is helpful to be familiar with the idiosyncrasies of previous compilations. For example, before the recodification of the Colorado Revised Statutes in 1973, there was not an annual printing of supplements to the statutes or a reprinting of the statutes themselves. Consequently, researching a section of law requires the use of the original sources of the law beginning with the Revised Statutes of Colorado 1868 and the other compilations and subsequent session laws.

Another idiosyncrasy involves the transition from one edition of the statutes to another. The following examples and rationales attempt to explain the variations.

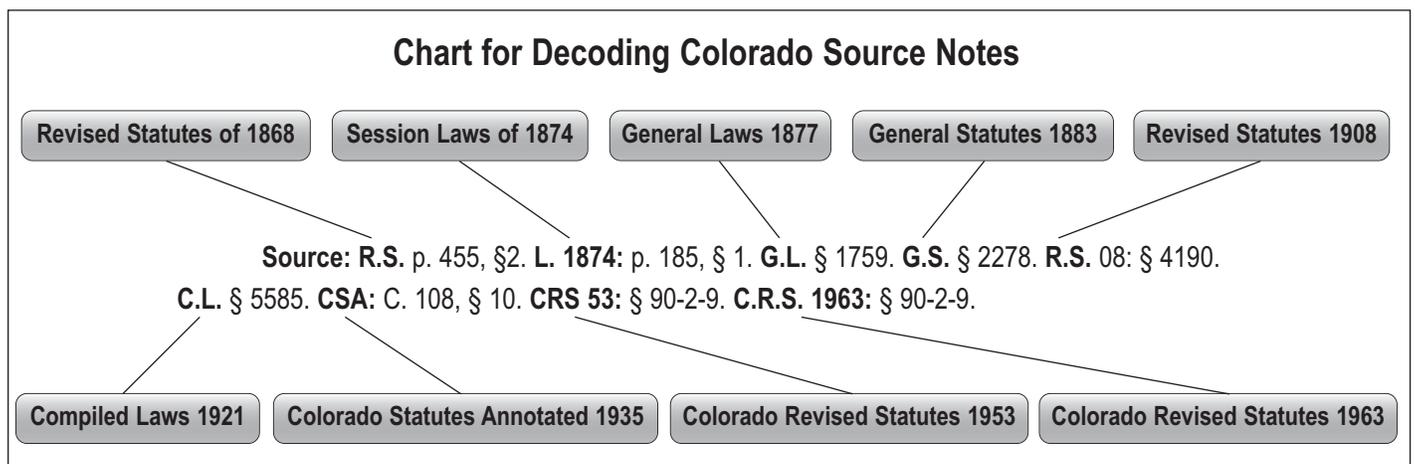
**Revised Statutes of Colorado (1868)**

**Compilation of territorial law.** Legislative assemblies of the Colorado territory convened in 1861, 1862, and 1864 through 1867. The acts were compiled with the first statutory revision of the publication of the Revised Statutes of Colorado (R.S.) in 1868, consolidating the territorial laws and making reference to previous session laws unnecessary.<sup>3</sup>

➤ Example: **Source:** R.S. p. 107, § 7. G.L. § 166. G.S. § 204. R.S. 08: § 675. C.L. § 4876. CSA: C. 40, § 8. CRS 53: § 118-1-7. C.R.S. 1963: § 118-1-7.

Using the chronological listing of Colorado's statutory publications at the beginning of this article, a researcher can track the history of this section. Because there is no entry of session laws "L. (year)" included in the source note above, a researcher can conclude that the section originated as territorial law and was never amended.

**Creation of new law.** The only other means by which a statute originates is indicated by the session laws entry "L. (year)." After every session of a General Assembly, both regular and extraordinary, a "Session Laws of Colorado" is published containing all laws of both a permanent and a temporary nature enacted at that session. Those laws of a permanent nature are codified into the statutes. The principal rule applicable for inclusion of any new section of law into any of the editions of the statutes is that the session laws entry appears before the edition of the publication in which it is included.



➤ Example: Source: L. 1874: p. 61, § 1. G.L. § 376. G.S. § 450. R.S. 08: § 1087. C.L. § 8565. CSA: C. 44, § 7. CRS 53: § 34-1-7. C.R.S. 1963: § 34-1-7.

The one exception to this rule is the publication of the laws adopted at the first session of the General Assembly following statehood. Those laws were compiled into the General Laws of Colorado 1877.

### *General Laws of Colorado (1877)*

**Transition from territorial law to state law.** After 1868, the legislative assemblies convened in even-numbered years—1870, 1872, 1874, and 1876. The session laws volume to the General Laws of Colorado (G.L.) is entitled “General Laws” and contains the acts passed in the 1870, 1872, 1874, and 1876 legislative assemblies. Also included in the compilation of the General Laws of Colorado were the acts enacted or amended during the first session of the General Assembly of the State of Colorado, which convened November 1, 1876 and concluded March 20, 1877. These acts, however, were not compiled into any session laws, nor were the proceedings of the session published in any journals. Instead, these acts were compiled with the territorial acts passed before the first legislative session into the General Laws of Colorado 1877.<sup>4</sup> Because the laws enacted or amended from November 1, 1876 through March 20, 1877 were not published in a separate session laws volume, entries in source notes referencing these acts begin with G.L. as seen below.

➤ Example: Source: G.L. § 1059. G.S. C. § 238. L. 1885: p. 200, § 1. L. 01: p. 173, § 1. R.S. 08: § 2416. C.L. § 6312. CSA: C. 61, § 2. CRS 53: § 50-1-2. L. 55: p. 368, § 1. C.R.S. 1963: § 50-1-2. L. 64: p. 265, § 154.

➤ Example: Source: L. 1874: p. 61, § 1. G.L. § 376. G.S. § 450. R.S. 08: § 1087. C.L. § 8565. CSA: C. 44, § 7. CRS 53: § 34-1-7. C.R.S. 1963: § 34-1-7.

In the example above, the section of law was added after the printing of the edition of the Revised Statutes of Colorado in 1868; therefore, the citation to the session laws appears before the edition of the statutes—the General Laws of Colorado 1877—in which it is included.

➤ Example: Source: R.S. p. 455, § 2. L. 1874: p. 185, § 1. G.L. § 1759. G.S. § 2278. R.S. 08: § 4190. C.L. § 5585. CSA: C. 108, § 10. CRS 53: § 90-2-9. C.R.S. 1963: § 90-2-9.

The example above indicates that the section of law can be tracked back to the codification of the Revised Statutes of Colorado in 1868 and that the section subsequently was amended in 1874. This section, as amended, appears in the General Laws of Colorado 1877.

**Transition from one codification to another.** Any subsequent amendments to an existing section of law printed in a prior codification or any subsequent session laws to that codification appear after that prior codification and before the next edition of the statutes in which it is included.

➤ Example: Source: L. 1874: p. 187, § 6. L. 1876: p. 94, § 1. G.L. § 1816. G.S. § 2402. R.S. 08: § 4198. C.L. § 3284. CSA: C. 110, § 174. CRS 53: § 92-22-7. C.R.S. 1963: § 92-22-7.

In the example above, the source note indicates that the section of law was added in 1874. In 1876, because the section had not yet been codified into the edition of the General Laws of Colorado 1877, the only avenue available to amend the section was to amend the session laws in which the section was printed.

### *General Statutes of Colorado (1883)*

After 1877, the General Assemblies convened in odd-numbered years from 1879 through 1949, with the exception of special sessions. Laws enacted or amended after 1877 through 1883 were compiled and printed in the edition of the statutes known as the General Statutes of Colorado 1883 (G.S.). Although the sections of law in the General Statutes of Colorado 1883 edition were arranged in a format similar to the General Laws of Colorado 1877, the sections were renumbered.

The following are two examples of source notes from sections citing the General Statutes of Colorado and the General Laws of Colorado, respectively:

➤ Example: Source: L. 1883: p. 275, § 3. G.S. § 3112. R.S. 08: § 6029. C.L. § 8051. CSA: C. 145, § 18. CRS 53: § 124-9-17. C.R.S. 1963: § 124-9-10.

➤ Example: Source: G.L. § 1059. G.S. C. § 238. L. 1885: p. 200, § 1. L. 01: p. 173, § 1. R.S. 08: § 2416. C.L. § 6312. CSA: C. 61, § 2. CRS 53: § 50-1-2. L. 55: p. 368, § 1. C.R.S. 1963: § 50-1-2. L. 64: p. 265, § 154.

In the second source note example above, “G.S. C.” means that this section is found in the Code of Civil Procedure located in the back of the index to the General Statutes of Colorado 1883.

### *Revised Statutes of Colorado (1908)*

The compilation of the Revised Statutes 1908 (R.S. 08) includes laws enacted or amended after the printing of the General Statutes of Colorado in 1883 through 1907, as seen in the two source note examples below:

➤ Example: Source: L. 1885: p. 270, § 1. R.S. 08: § 6914. C.L. § 507. CSA: C. 168, § 16. CRS 53: § 142-1-16. C.R.S. 1963: § 143-1-16.

➤ Example: Source: L. 07: p. 158, § 4. R.S. 08: § 5865. C.L. § 8252. CSA: C. 154, § 37. CRS 53: § 131-5-1. C.R.S. 1963: § 131-5-1.

As with earlier compilations, the sections of law in the Revised Statutes of Colorado 1908 were renumbered.<sup>5</sup> Historical information is provided in the Revised Statutes of Colorado in inverse order immediately following the text for each section appearing in the Revised Statutes of Colorado 1868, the General Laws of Colorado 1877, and the General Statutes of Colorado 1883 and subsequent session laws, precisely in the following format:

➤ Example: [G. S., §981; G. L., §840; R. S., p. 252, §239.

### *Compiled Laws of Colorado (1921)*

Laws enacted or amended after the printing of the Revised Statutes of Colorado 1908 were incorporated into the Compiled Laws of Colorado 1921 (C.L.), including laws enacted at the extraordinary session in 1922, as seen in the example below.

➤ Example: Source: L. 22: p. 88, § 1. C.L. § 9590.

References in some source notes to “Code 08,” “Code 21,” and “Code 35” refer to the Code of Civil Procedure located in the front of the Revised Statutes of Colorado 1908, Compiled Laws of Colorado 1921, and Colorado Statutes Annotated 1935, respectively. All volumes also set forth the general statutes of the State of Colorado.

➤ Example: Source: L. 1887: p. 216, § 431. Code 08: § 466. Code 21: § 467. Code 35: § 467. CRS 53: § 12-1-20. C.R.S. 1963: § 12-1-20. L. 64: p. 208, § 14.

Historical information is provided after each section in the Compiled Laws of Colorado in primarily inverse order for sections appearing in the Revised Statutes of Colorado 1868, the General Laws of Colorado 1877, the General Statutes of Colorado 1883, and the Revised Statutes of Colorado 1908 and subsequent session laws, precisely in the following format:

➤ Example: [L. '07, p. 562, §1; amending G. S., §3044; L. '83, p. 263, §1; R. S. '08, §5914.

➤ Example: [G. S., §3381; G. L., §2718; R. S. '08, §6553.

It is important to understand that, in all of the compilations discussed above, because there was a hiatus with the compilations and printing of the statutes, amending the session laws or amending a previous compilation became necessary, as illustrated in the example below. The section of law below was added in 1915 after the compilation of the Revised Statutes of Colorado 1908 and before the compilation of the Compiled Laws of Colorado 1921. The amendment in 1921 was made to the session laws of 1915 because it was the only place in which the section, as amended, was printed. This is typical with all of the earlier compilations of the statutes. The section, as enacted in 1915, appears in the Compiled Laws of Colorado 1921, as it was amended in 1921.

➤ Example: **Source:** L. 15: pp. 562, 563, §§ 1, 2, 4. L. 21: p. 828, § 2. C.L. §§ 4325, 4326, 4328. CSA: C. 97, §§ 1, 2, 4. CRS 53: §§ 80-1-1 to 80-1-3. C.R.S. 1963: §§ 80-1-1 to 80-1-3.

### *Colorado Statutes Annotated (1935)*

**Original volumes.** The publication of the Colorado Statutes Annotated 1935 (CSA) in 1937 consists of laws enacted or amended after the printing of the Compiled Laws of Colorado 1921, including amendments made or laws enacted from 1923 through the extraordinary session of 1936. It also incorporates annotations. Historical information follows each section.

The example below illustrates the inclusion of new law into the Colorado Statutes Annotated 1935:

**Source:** L. 35: p. 263, § 1. CSA: C. 25, § 67. CRS 53: § 122-7-1. C.R.S. 1963: § 122-6-1. L. 2004: (1)(c) amended, p. 140, § 26, effective July 1.

**Supplements and replacement volumes to original volumes.** Although no provision was made for perpetual revision or for the publication of annual supplements, cumulative supplements to the Colorado Statutes Annotated 1935 were printed in 1938, 1941, 1942, 1951, and 1953. Replacement volumes were printed in 1949 (volumes 4A and 4B) and 1952 (volumes 3A and 3B). The indices located in the back of the 1951 and 1953 cumulative supplements make note of this fact with an asterisk next to the entry with the section referencing the reader to the applicable replacement volume.

### *Colorado Revised Statutes 1953 (1953)*

The General Assembly convened every year with the commencement of the first regular session of the thirty-eighth General Assembly in 1951 and the second regular session in 1952.

**Formatting of CRS 53.** Although all of the prior codifications of the statutes were arranged into chapters, starting with the codifications of Colorado Revised Statutes 1953 (CRS 53) and Colorado Revised Statutes 1963, the chapter and section numbers were incorporated into one statutory section number rather than separated as with the Colorado Statutes Annotated 1935. In the source note below for CRS 53, in the three-part section number shown

as 63-2-5, “63” represents the chapter number, “2” represents the article number, and “5” represents the section number. The three numbers combined “63-2-5” form a section of CRS 53. The same applies to C.R.S. 1963.

➤ Example: **Source:** L. 15: p. 254, § 1. C.L. § 6. CSA: C. 74, § 6. L. 45: p. 366, § 1. L. 47: p. 479, § 1. L. 51: p. 439, § 1. CRS 53: § 63-2-5. C.R.S. 1963: § 63-2-5.

The Colorado Revised Statutes 1953 (CRS 53) were published and printed in seven volumes containing all of the laws of a general and permanent nature from prior codifications and laws enacted or amended after the publication of the Colorado Statutes Annotated 1935 through 1953. Biennial supplements were printed for the Colorado Revised Statutes 1953 from 1955 through 1961. A permanent hardbound supplement entitled “1960 Permanent Supplement” was printed, and it includes all the enacted laws beginning with the second regular session of the thirty-ninth General Assembly in 1954, and concluding with the second regular session of the forty-second General Assembly in 1960. A separate supplement was printed for the laws enacted by the forty-third General Assembly at its first regular session in 1961 and at its extraordinary session in 1961.

**Source note information.** Many of the laws in the Colorado Revised Statutes 1953 (CRS 53) were included in one of the earlier compilations as demonstrated below:

➤ Example: **Source:** R.S. p. 419, § 1. G.L. § 1928. G.S. § 2474. R.S. 08: § 4672. C.L. § 19. CSA: C. 74, § 19. CRS 53: § 63-2-16. C.R.S. 1963: § 63-2-16. L. 97: Entire section amended, p. 1557, § 10, effective July 1.

Starting with the Colorado Revised Statutes 1953, the source notes were assembled in chronological order, rather than in inverse order from the earlier compilations, arranging them in a format that closely parallels the format currently used, as shown in the example below.

➤ Example: **Source:** L. 07, p. 242, § 8; R. S. 08, § 378; L. 11, p. 651, § 1; C. L. § 977; CSA, C. 78, § 111; L. 57, p. 417, § 1.

The source note above is from the 1960 permanent supplement to the Colorado Revised Statutes 1953. As with all the previous codifications of statutes, no reference appears in the source notes to the existing version of the statutes until it is codified into a subsequent edition. See the example below, taken from C.R.S. 1963. It is not until the next compilation in 1963 that the 1953 section number is referenced.

➤ Example: **Source:** L. 07, p. 242, § 8; R. S. 08, § 378; L. 11, p. 651, § 1; C. L. § 977; CSA, C. 78, § 111; CRS 53, § 66-8-7; L. 57, p. 417, § 1.

**Comparative tables and sections renumbered.** A table comparing the Colorado Statutes Annotated 1935 to the Colorado Revised Statutes 1953 and session laws 1935 through 1953 was printed and included in the front of the index to the Colorado Revised Statutes 1953. In addition, a comparative table for the session laws from 1954 through 1960 was printed, and that table is located in the back of the 1960 permanent supplement. A researcher should watch for sections that were renumbered for inclusion in the codifications of the Colorado Revised Statutes 1953, 1963, and 1973 in the comparative tables.<sup>6</sup>

➤ Example: **Source:** L. 58: p. 128, § 14. L. 59: p. 327, § 4. CRS 53: § 31-30-1. C.R.S. 1963: § 31-4-1.

The source note above is an example of a source note for a statute in CRS 1953 that was renumbered in C.R.S. 1963. The

comparative table located at the beginning of the C.R.S. 1963 index is a helpful tool when a researcher knows the 1953 statutory number but not the number it became in 1963. The same principle applies for conversion of the C.R.S. 1963 to C.R.S. 1973. If a title, an article, or a part is added/repealed and reenacted/amended with relocations/recreated and reenacted, using the comparative tables located in the back of the index is helpful when tracking the changes. Editor notes that are printed following title, article, or part headings inform the reader of renumbered or relocated provisions for which a comparative table has been included in the index.

### *Colorado Revised Statutes 1963 (1963)*

**Publication format of C.R.S. 1963 similar to CRS 53.** The publication of the Colorado Revised Statutes 1963 (C.R.S. 1963) essentially was an extension of the Colorado Revised Statutes 1953, with some renumbering. The C.R.S. 1963 incorporated the revised and reenacted supplements up to and including laws enacted by the 1963 session of the General Assembly. A table comparing the CRS 53 numbers to the C.R.S. 1963 numbers was printed, and it is located in the front of the index to the C.R.S. 1963.

A cumulative table of the additions, amendments, and repeals for the years 1964 through 1971 was printed for the Colorado Revised Statutes 1963. It is located in the back of the 1971 permanent cumulative supplement to the Colorado Revised Statutes 1963.

Biennial cumulative supplements were printed for the Colorado Revised Statutes 1963 for the years 1965 through 1971; however, any section amended or added and appearing in one of the biennial cumulative supplements does not appear in subsequent supplements unless the section was further amended. Each biennial cumulative supplement from one volume to the next incorporates only those sections amended or added between printings of the cumulative biennial supplements.

There are situations in which newly enacted provisions were further amended in the same year. This is indicated with the double entry of page numbers and section numbers following the year of the session laws entry (L. 72). With the exception of an entire article being repealed and reenacted (R&RE) as in the example below, any other form of change to a statutory section, such as an amendment, an addition of new language, or the repeal of existing law, is not indicated before 1974.

➤ Example: Source: L. 72: R&RE, pp. 380, 413, §§ 1, 2. C.R.S. 1963: § 63-9-3.

**Recommendation for renumbering and reorganizing statutes.** In 1966, the Committee on Legislative Procedures recommended that the General Assembly reorganize the statutes into smaller volumes covering subject matter codes and provide for each code's continuous revision and republication.<sup>7</sup> The Committee recommended that the General Assembly abandon the alphabetical arrangement of chapters and the numbering system then in use, in favor of an arrangement by subject matter and a more flexible numbering system.

Accordingly, the Colorado Revised Statutes 1973 were renumbered and reorganized into titles, articles, and parts. Annual paperback supplements and hardbound replacement volumes were used to update the Colorado Revised Statutes annually from 1975 to 1996. In 1997, the practice of using supplements and replacement volumes to update the Colorado Revised Statutes, originally enti-

tled Colorado Revised Statutes 1973, was discontinued and replaced with the annual publication of softbound volumes of the law, incorporating all laws passed at the previous legislative session. As with all the previous codifications of statutes, no reference appears in the source notes to the existing version of the statutes until it is codified into a subsequent edition, as is evident with the exclusion of the C.R.S. 1973 numbers from the source notes.

In the back of the index to C.R.S. 1973 and subsequent printings of the index, there are tables comparing the C.R.S. 1963 numbers to the C.R.S. 1973 numbers and several smaller tables showing the disposition of titles or articles that were added/repealed and reenacted/amended with relocations/recreated and reenacted, resulting in the relocation of sections or subject matter.

➤ Oddity: In 1974, any newly enacted sections created under existing chapters in the 1963 Colorado Revised Statutes will not be found in the 1963 to 1973 comparative tables located in the back of the index. The 1963 conversion of new sections to the 1973 Colorado Revised Statutes can be found only in the 1974 pre-supplement comparative tabulation table located in the back of the 1974 session laws.

### *Colorado Revised Statutes (1973)*

For amendments made after 1973, the source note provides information on each specific provision of the section of law changed by an act, the type of change made to the provision (that is, added, added with relocations, amended, amended with relocations, repealed, repealed and reenacted, or recreated and reenacted), and the effective date of the act making the change.

The legislative history is arranged by year of passage; if a section is amended by two or more acts in the same year, the change that takes effect first is listed first. As mentioned previously, beginning in 1901 and ending in 1999, the year in the source notes was abbreviated as the last two digits of the year. Displaying the year in its entirety began in 2000.

All provisions from the same act appear in numeric order. Provisions within a section are grouped according to the specific changes (that is, added, amended, repealed, repealed and reenacted, or recreated and reenacted). Provisions that are amended by more than one act in the same year are separated by their effective dates and arranged numerically and separated by semicolons, and a period is placed at the end of each year's entry. Starting in 2009, reference to the bill number adding, amending, or repealing a provision of the statute is included in the source note to aid the legislative researcher. If a researcher is researching the Colorado Revised Statutes on the Internet using the Colorado General Assembly's website ([www.leg.state.co.us](http://www.leg.state.co.us)), the bill number reference presents a direct hyperlink to the bill.

➤ Example: **Source: L. 64:** R&RE, p. 803, § 1. **C.R.S. 1963:** § 138-1-90. **L. 65:** p. 1131, § 1 (1). **L. 81:** Entire section amended, p. 1866, § 10, effective June 8. **L. 91:** (5) added, p. 1999, § 2, effective May 1. **L. 91, 2nd Ex. Sess.:** (2) amended, p. 98, § 4, effective January 1, 1992. **L. 99:** (5) repealed, p. 629, § 42, effective August 4. **L. 2009:** (2) and (4) amended, (HB 09-1219), ch. 71, p. 242, § 3, effective March 25; (4) amended, (HB 09-1001), ch. 220, p. 1000, § 2, effective August 5.

## Conclusion

At some point in his or her career, a practitioner is likely to be faced with a question concerning the true intention of a piece of legislation otherwise in dispute. There are few shortcuts to the process of legislative research. This article describes the history and development of Colorado statutory source notes. With this information, the researcher will be able to locate various changes a statute has undergone over the years or the original legislative act.

This may add clarity and aid in resolving questions concerning legislative intent and purpose.

For more information, see "Researching Legislative History," prepared by Peggy Lewis and Matt Dawkins, Colorado Office of Legislative Legal Services, available at the Colorado General Assembly website, [www.leg.state.co.us](http://www.leg.state.co.us). Scroll down to Services Agencies, Legislative Legal Services, on the right side of the page. At the next screen, on the left, choose Legal Topics, Information on Bill Drafting and Statutory Research, Researching Legislative History.

## Notes

1. An unabridged version of this article is available at the Colorado General Assembly website, [www.leg.state.co.us](http://www.leg.state.co.us). Scroll down to Services Agencies, Legislative Legal Services. At the next screen, on the left, choose Legal Topics, Information on Bill Drafting and Statutory Research, Understanding Colorado Statutory Source Notes.

2. See Jacobstein, "Colorado Statutes: Past, Present, and Future," 33 *Rocky Mountain L.Rev.* 36-45 (1960) (comprehensive, analytical study of Colorado's early law).

3. See Revised Statutes of Colorado 1868 at 4, 683-94.

4. See section 1 of the Schedule located at the end of the Colorado Constitution. The authors found no evidence that journals or session laws were published for the first session of the Colorado General Assembly in 1876 after contacting the Colorado Joint Legislative Library, Colorado Supreme Court Library, Colorado Historical Society, State of Colorado Archives, University of Denver Penrose Library, and William A. Wise Law Library at the University of Colorado at Boulder (confirmed in the State Board of Library Commissioners, "Check List of Colorado Public Documents" at 83, 90).

5. See the Preface, Revised Statutes of Colorado 1908.

6. In the current publication of the Colorado Revised Statutes, an editor's note following the source note informs the reader when a section or any part of the section has been renumbered pursuant to the authority granted in CRS § 2-5-101.

7. See Research Publication No. 119, "Legislative Procedures in Colorado, a report to the Colorado General Assembly" 50-52 (Dec. 1966), available at the Colorado Joint Legislative Library located in the Capitol Building. ■