District Court Mesa County, State of Colorado Court Address: 125 N. Spruce St., Grand Jct., CO 81505 DATE FILED: July 13, 2022 5:09 PM FILING ID: D94544447C004 CASE NUMBER: 2022CR371 Plaintiff(s): People of the State of Colorado, ☐ COURT USE ONLY ☐ **Defendant(s): TINA MARIE PETERS** DANIEL P. RUBINSTEIN, District Attorney Case Number: 22 CR 371 District Attorney's Office Twenty-First Judicial District of Colorado P.O. Box 20,000 Div.: 09 - BARRETT Grand Junction, CO 81502-5031 Phone Number: (970) 244-1730 Fax Number: (970) 244-1729 Atty. Reg. #: 27473

PEOPLE'S VERIFIED MOTION TO REVOKE BOND

COME NOW the People of the State of Colorado, by and through their undersigned representative, and hereby moves this Honorable Court to revoke Defendant's bail bond and issue a warrant for her arrest for violating the terms and conditions of her bond.

AS GROUNDS THEREFORE, the People state as follows:

- 1. The defendant is on bond of \$25,000 cash bond. There is a bond condition that prohibits her from leaving the State of Colorado without court approval. On July 8, 2022, defense counsel filed a notice of travel, pursuant to the procedure previously employed by the court and counsel. The defense then filed an amended notice correcting some information. At no time did the travel request ask for any travel to occur on July 12, 2022 or July 13, 2022. (see defense motions in court file).
- 2. On July 11, 2022, the undersigned filed a motion objecting to the defendant traveling without prior approval of the court, as is required in any other defendant's cases. The court reserved ruling on the People's motion pending a response from the defense by July 15, 2022, but ordered that no travel be authorized until the People's motion is resolved.
- 3. On today's date, July 13, 2022 the undersigned received an electronic copy of a letter from Ms. Peters to the Colorado Secretary of State. The letter is dated July 12, 2022 and the notary certifying that Tina Peters signed is from a notary in Clark County, Nevada. Further, it appears that the letter previously stated that it was sworn and signed by a person in Colorado, and the notary, Laurince Lovelife, crossed out Colorado and wrote Clark County, Nevada. See attached Exhibit 1.
- 4. The People have further learned that Ms. Peters was in Las Vegas, Nevada for a conference for the Constitutional Sheriff's and Peace Officer's Association, and

that she spoke at the conference. Looking at the website of the organization, they had a conference scheduled in Las Vegas at that time. DA Investigator Struwe has also now found a video on Frankspeech.com with the three hour video from 7/12/2022 in Las Vegas of the conference. At the 2:27:50 second mark, Ms. Peters takes the stage. Investigator Struwe also contacted Laurince Lovelife by telephone on today's date. Mr. Lovelife confirmed the authenticity of the letter, and his notary of it, and that she was present with him in person in Las Vegas, NV when she signed it. This signature occurred at 2800 W. Sahara Ave., Suite 1F, in Las Vegas, Nevada. That address is for a business called Las Vegas notary public.

5. The defendant was not permitted to go to Las Vegas, NV during this time for two reasons. First, the defense never asked to go during this time. Second, even the travel that was requested was not granted until the People's objection was resolved, per the order on July 11, 2022. It should be noted that Ms. Peters was at the Mesa County Detention Facility with co-defendant Sandra Brown on July 11, 2022 at 5:00pm, nearly 5 hours after the court restricted any out of state travel.

WHEREFORE, the People respectfully move this Honorable Court Revoke the Defendant's bail bond and issue a warrant for her arrest for violating her conditions of bond.

Verification: attached and scanned as an exhibit

Respectfully submitted this 13th day of July, 2022.

DANIEL P. RUBINSTEIN District Attorney Twenty-First Judicial District

By *Daniel P. Rubinstein*Daniel P. Rubinstein, Reg. No. 27473
Deputy District Attorney

CERTIFICATE OF DELIVERY

I hereby certify that I have duly served the within Verified Motion to Revoke Bail Bond upon the Defendant by e-filing it and serving the defendant's attorney of record, this 13th day of July, 2022.

$\mathbf{R}\mathbf{v}$	Daniel P	Rubinstein	
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