

District Court Mesa County, State of Colorado Court Address: 125 N. Spruce St., Grand Jct., CO 81505	DATE FILED: July 11, 2022 10:06 AM FILING ID: 925C7BA81CB39 CASE NUMBER: 2022CR371
Plaintiff(s): People of the State of Colorado, vs. TINA PETERS	↑ COURT USE ONLY ↑ <hr/> Case No. 22CR371
<hr/> Daniel P. Rubinstein District Attorney's Office Twenty-First Judicial District of Colorado P.O. Box 20,000 Grand Junction, CO 81502-5031 Phone Number: (970) 244-1730 Fax Number: (970) 244-1729 Atty. Reg. #: 27473	Div.: 9 - BARRETT
OBJECTION TO NOTICE OF TRAVEL	

COME NOW, the People of the State of Colorado, by their undersigned representative, object to Ms. Peters notice of travel and request that the defendant be required to file a motion with the court prior to travel:

1. Prior to the primary election, Harvey Steinberg, counsel for Ms. Peters, contacted the undersigned and indicated that Ms. Peters was a statewide candidate for office and she needed to travel regularly in order to campaign. He indicated that the process of seeking permission to travel out of state involving a reserved ruling from the court may not be quick enough to allow her to travel, as needed, for campaign purposes, and that he was concerned that the undersigned was therefore influencing an election.
2. Mr. Steinberg suggested, and the People agreed, that he simply file a notice indicating that Ms. Peters was traveling, where she was going, where she was staying, how she was traveling and when she was returning, and that the People would not object, in order to assure that the election was uninfluenced.
3. Since that time, Ms. Peters has lost the election and is no longer a candidate.
4. The People believe that Ms. Peters needs to be treated like all other criminal defendants on bond and needs to file a motion asking for a modification of her bond conditions, and get permission from the court prior to traveling. Ms. Peters has less motivation to appear in court now that she is no longer a candidate. Additionally, she has evidenced through her travel prior to the election that she has the means to flee if she wants to.

WHEREFORE, the People respectfully request this Honorable Court order that the defendant not leave the jurisdiction of Colorado without a specific order from the court granting permission after explaining why she should have her bond conditions modified.

Respectfully submitted this 11th day of July, 2022.

DANIEL P. RUBINSTEIN, Reg. No. 27473
District Attorney
Twenty-first Judicial District

/s/ Daniel P. Rubinstein
Daniel P. Rubinstein, Reg. No. 27473
District Attorney

CERTIFICATE OF DELIVERY

I hereby certify that I have duly served the within Motion on defense counsel through the Colorado Courts e-filing system, this 11th day of July, 2022.

/s/ Haley Gonzalez