

COMBINED COURT
JEFFERSON COUNTY, CO

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District Court Jefferson County, Colorado Court Address: 100 Jefferson County Parkway Golden, CO 80401-1070	District Court Jefferson County AUG 2 2005	2005 AUG 29 AM 8:35
PEOPLE OF THE STATE OF COLORADO v. ROBERT LOREN TURLEY Defendant	Division 6 _____ Enter _____ File _____	COURT USE ONLY
Scott W. Storey, District Attorney Christopher T. Brousseau, DDA 500 Jefferson County Parkway Golden, CO 80401-6002 Phone Number: (303)271-6800 FAX Number: (303)271-6888 E-mail: Attorney Reg. #31273		Case No. 04CR02447 Div: 6 Ctrm:
BILL OF PARTICULARS		

SCOTT W. STOREY, District Attorney in and for the First Judicial District, County of Jefferson, State of Colorado, respectfully submits the following Bill of Particulars:

1. Count 1. - Between and including November 1, 2001 and January 31, 2002, the Defendant entered into a contract with Helen Girard (with the assistance of Randall Laurence). The contract related to the purchase of land and/or placing a manufactured home on the property. Ms. Girard paid the Defendant a substantial sum of money (detailed in the discovery) and received nothing in return from the Defendant. The People allege that this conduct constitutes theft pursuant to C.R.S. 18-4-401(1)(a) and (b) and C.R.S. 18-6.5-103(5). The People further allege that the Defendant was required to hold the money Ms. Girard gave to him in trust and not spend the money on anything other than her project pursuant to 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.

2. Count 2. - Between and including May 1, 2003 and December 31, 2003, the Defendant entered into a contract with Pamela and Evertt Mitchell. The contract related to the purchase of land and/or placing a manufactured home on the property. The Mitchells paid the Defendant a substantial sum of money (detailed in the discovery) and received a minimal amount of work (detailed in the discovery) in return from the Defendant. The People allege that this conduct

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constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the money the Mitchells gave to him in trust and not spend the money on anything other than their project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.

3. Count 3. - Between and including May 1, 2003 and December 31, 2003, the Defendant entered into a contract with Marcia Eck. The contract related to the purchase of land and/or placing a manufactured home on the property. Ms. Eck paid the Defendant a substantial sum of money (detailed in the discovery) and received a minimal amount of work (detailed in the discovery) in return from the Defendant. The People allege that this conduct constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the money Ms. Eck gave to him in trust and not spend the money on anything other than her project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.
4. Count 4. - Between and including June 1, 2003 and December 31, 2003, the Defendant entered into a contract with Gail Studeler. The contract related to the purchase of land and/or placing a manufactured home on the property. Ms. Studeler paid the Defendant a substantial sum of money (detailed in the discovery) and received a minimal amount of work (detailed in the discovery) in return from the Defendant. The People allege that this conduct constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the money Ms. Studeler gave to him in trust and not spend the money on anything other than her project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.
5. Count 5. - Between and including August 1, 2001 and December 31, 2001, the Defendant entered into a contract with John and Jeanne Adams. The contract related to the purchase of land and/or placing a manufactured home on the property. The Adams' paid the Defendant a substantial sum of money (detailed in the discovery) and received some materials and labor but not all of the material and labor the Defendant was paid to complete (detailed in the discovery). The People allege that this conduct constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the

money the Adams' gave to him in trust and not spend the money on anything other than their project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.

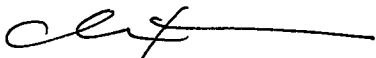
6. Count 6. - Between and including January 1, 2004 and March 31, 2004, the Defendant entered into a contract with Natalie and Vitaley Kovalenko. The contract related to the purchase of land and/or placing a manufactured home on the property. The Kovalenkos paid the Defendant a substantial sum of money (detailed in the discovery) and received a minimal amount of work (detailed in the discovery) in return from the Defendant. The People allege that this conduct constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the money the Kovalenkos gave to him in trust and not spend the money on anything other than their project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.

7. Count 7. - Between and including January 1, 2004 and March 31, 2004, the Defendant entered into a contract with Liliya and Sergey Kovalenko. The contract related to the purchase of land and/or placing a manufactured home on the property. The Kovalenkos paid the Defendant a substantial sum of money (detailed in the discovery) and received a minimal amount of work (detailed in the discovery) in return from the Defendant. The People allege that this conduct constitutes theft pursuant to 18-4-401(1)(a) and (b). The People further allege that the Defendant was required to hold the money the Kovalenkos gave to him in trust and not spend the money on anything other than their project pursuant to C.R.S. 38-22-126. The defendant committed theft when he spent the money on purchases not directly related to the project.

Respectfully submitted,

SCOTT W. STOREY
District Attorney

By:


CHRISTOPHER T. BROUSSEAU
Deputy District Attorney
Registration No. 31273

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