

District Court Jefferson County, Colorado Court Address: 100 Jefferson County Parkway Golden, CO 80401-1070	2005 AUG 31 AM 8:46
PEOPLE OF THE STATE OF COLORADO v. ROBERT LOREN TURLEY Defendant	RECEIVED District Court COURT USE ONLY Jefferson County
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 AUG 31 2005 Div: 6 Division 6 _____ Enter _____ Ctrm: File _____
MOTION TO AMEND COUNTS ONE THROUGH SEVEN	

SCOTT W. STOREY, District Attorney in and for the First Judicial District, County of Jefferson, State of Colorado, respectfully requests this Honorable Court to amend the dates of violation on Counts One through Seven of the Information.

The amended charges are as follows:

COUNT 1-THEFT FROM AN AT-RISK ADULT OVER \$500 (F3)

Between and including November 1, 2001 and January 31, 2002 ROBERT LOREN TURLEY did unlawfully and knowingly obtain and exercise control over a thing of value, to-wit: U.S. Currency with the value of five hundred dollars or more from Helen Girard, a person sixty (60) years of age or older, without authorization, or by threat or deception and intended to deprive the owner permanently of the use or benefit of the thing of value or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit, and an element and portion of the offense was committed in the presence of the victim; contrary to the form of the statute in such case made and provided, Section 18-6.5-103(5) and 18-4-401(1) (a) (b), (2) (d), C.R.S., and against the peace and dignity of the People of the State of Colorado. (F3)

DOCKETED

COUNT 2-THEFT (F3)

Between and including May 1, 2003 and December 31, 2003 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of Pamela and Everett Mitchell, with the value of fifteen thousand dollars or more, without authorization, or by threat or deception, and intended to deprive Pamela and Everett Mitchell permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (d), C.R.S.

COUNT 3-THEFT (F3)

Between and including May 1, 2003 and December 31, 2003 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of Marcia Eck, with the value of fifteen thousand dollars or more, without authorization, or by threat or deception, and intended to deprive Marcia Eck permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (d), C.R.S.

COUNT 4-THEFT (F3)

Between and including June 1, 2003 and December 31, 2003 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of Gail Studeler, with the value of fifteen thousand dollars or more, without authorization, or by threat or deception, and intended to deprive Gail Studeler permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (d), C.R.S.

COUNT 5- THEFT (F3)

Between and including August 1, 2001 and December 31, 2001 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of John and Jeanne Adams, with the value of fifteen thousand dollars or more, without authorization, or by threat or deception, and intended to deprive John and Jeanne Adams permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (d), C.R.S.

COUNT 6-THEFT (F4)

Between and including January 1, 2004 and March 31, 2004 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of Natalie and Vitaliy Kovalenko, with the value of five hundred dollars or more but less than fifteen thousand dollars, without authorization, or by threat or deception, and intended to deprive Natalie Vitaliy Kovalenko permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (c), C.R.S.

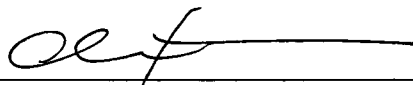
COUNT 7-THEFT (F4)

Between and including January 1, 2004 and March 31, 2004 ROBERT LOREN TURLEY unlawfully and knowingly obtained or exercised control over a thing of value, namely: U.S. Currency, of Liliya and Sergey Kovalenko, with the value of five hundred dollars or more but less than fifteen thousand dollars, without authorization, or by threat or deception, and intended to deprive Liliya and Sergey Kovalenko permanently of its use or benefit or knowingly uses, conceals, or abandons the thing of value in such a manner as to deprive the other person permanently of its use or benefit; in violation of section 18-4-401(1) (a) (b), (2) (c), C.R.S.

Respectfully submitted,

SCOTT W. STOREY
District Attorney

By:


CHRISTOPHER T. BROUSSEAU
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Registration No. 31273

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