

COUNTY COURT, CITY & COUNTY OF DENVER,
COLORADO

Court Address: 1437 Bannock St., Room 108
Denver, CO 80202

**THE PEOPLE OF THE STATE OF COLORADO, &
THE CITY & COUNTY OF DENVER**

v.

**JO ANN SCOTT,
Defendant**

Attorney for Respondent:

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Case Nos. 07M010757

07M010758

Courtroom: 100K

MOTION TO DISMISS

COMES NOW the Defendant, Jo Ann Scott, by and through her undersigned counsel, and moves this court to dismiss all charges brought against the Defendant for the reason that the statute that Defendant is accused of violating, C.R.S. § 18-9-122 is unconstitutional as applied to the Defendant. As grounds therefore, the Defendant states as follows.

FACTS

1. On June 27, 2007, Defendant was cited by the Denver Police Department for violating the provisions of C.R.S. § 18-9-122. The alleged incident in question occurred on April 20, 2007, and is alleged to have consisted of the Defendant following the alleged victims with in the eight-foot “bubble” on a public sidewalk in violation of the provisions of C.R.S. § 18-9-122(3) at a Planned Parenthood facility located at 2030 E. 20th Ave, Denver, CO 80205 (the “Facility”).
2. Abortions of unborn children are performed at the Facility.

3. Most persons going to the Facility park in a parking lot at the facility and enter the Facility through the entrance to the parking lot.
4. On occasion, persons entering the Facility park on the public street adjoining the Facility and access the Facility by walking down a public sidewalk adjacent to the facility.
5. There are no markings on the facility. This requires a person on the sidewalk to guess at the point at which the person enters the hundred foot zone specified by C.R.S. § 18-9-122(3).
6. Defendant is a “sidewalk counselor” who conducts her counseling activities on the public sidewalk adjacent to the Facility. Defendant’s counseling begins with her following the person or persons accessing the Facility at a distance and talking in conversational tones to the person or persons entering the Facility.
7. The person or persons accessing the Facility usually consist of a pregnant woman seeking an abortion and/or another woman or the pregnant woman’s boy friend or husband.
8. Defendant endeavors to talk with the person or persons entering the Facility and to persuade the pregnant woman not to go through with the abortion.
9. Defendant talks in calm, quiet tones and cannot be heard over traffic on the street next to the public sidewalk from a distance of eight feet. Further, it is impossible for the Defendant to tell where the moving eight foot “bubble “ begins when she is walking behind the person or persons accessing the Facility.
10. Defendant does not yell at the persons or persons on the sidewalk, thrust signs in their faces, or try to upset them because that is an ineffective method of persuasion. Defendant does not try to physically prevent the persons or persons from entering the facility. Defendant does not follow the persons or persons onto the private grounds of the Facility.
11. There is no other viable means by which the Defendant may reach the person or persons entering on the facility.
12. Using her calm, quiet conversational method of persuasion, Defendant has been successful in changing the minds of some 70 pregnant women in the past year.
13. Defendant was charged criminally for using her conversational method of persuasion on the public sidewalk adjoining the Facility when she allegedly followed the alleged “victims” on the date in question while attempting to persuade the female not to have an abortion.

14. The alleged victims are not handicapped.

LEGAL BACKGROUND

15. In 1993, the Colorado Legislature enacted C.R.S. § 18-9-122. The stated purpose was to “enact legislation that prohibits a person from knowingly obstructing another person’s entry to or exit from a health care facility.” C.R.S. § 18-9-122(1).
16. Abortion opponents brought a facial challenge against C.R.S. § 18-9-122 alleging that it violated the Free Speech Clause of the First Amendment to the United States Constitution. *Hill v. City of Lakewood*, 949 P.2d 107, 108 (Colo.App. 1997). The district court upheld the constitutionality of C.R.S. § 18-9-122 against the facial First amendment challenge, and the Colorado Court of Appeals affirmed. *Id.*
17. The Colorado Court of Appeals noted that a primary purpose of C.R.S. § 18-9-122 was to insure that “one with physical disabilities has unimpeded access to a medical clinic” *Id.* at 110.
18. The Colorado Supreme Court granted certiorari to determine whether C.R.S. § 18-9-122 could “withstand scrutiny under a facial First Amendment challenge.” *Hill v. Thomas*, 973 P.2d 1246, 1248 (Colo. 1999).
19. The Colorado Supreme Court noted that C.R.S. § 18-9-122 was enacted “as a consequence of testimony that revealed widespread, violent confrontations” in public places involving persons seeking counseling and treatment at Colorado health care facilities. *Id.* at 1249. Specifically, one nurse practitioner testified that ant-abortion protesters “yell, thrust signs in faces, and generally try to upset the patient as much as possible.” *Id.* at 1250.
20. The Colorado Supreme Court balanced the First Amendment’s free speech right against the right of privacy of a woman to enter a clinic for an abortion and found that C.R.S. § 18-9-122 survived the facial constitutional challenge.
21. The case then proceeded to the United States Supreme Court, and that court granted certiorari. *Hill v. Colorado*, 530 U.S. 703, 714 (2000).
22. The United States Supreme Court upheld C.R.S. § 18-9-122 against the facial constitutional challenge. *Id.* at 735.
23. C.R.S. § 18-9-122 has not been challenged under Article II, Section 10 of the Colorado Constitution.

24. The Defendant is apparently the first person prosecuted for violating C.R.S. § 18-9-122.

C.R.S. § 18-9-122(3) AS APPLIED TO THE DEFENDANT IS UNCONSTITUTIONAL UNDER THE FREE SPEECH CLAUSE OF THE FIRST AMENDMENT

25. Although a statute has been found to be facially constitutional, an individual Defendant may still raise an as-applied constitutional challenge concerning her own conduct and speech. *City of Englewood v. Hammes*, 671 P.2d 947, 951 (Colo. 1983). The United States Supreme Court has said, “Our cases further establish that a statute or a rule may be held constitutionally invalid as applied when it operates to deprive an individual of a protected right although its general validity as a measure enacted in the legitimate exercise of state power is beyond question.” *Boddie v. Connecticut*, 401 U.S. 371, 379 (1971). “Thus, in cases involving religious freedom, free speech or assembly, this Court has often held that a valid statute was unconstitutionally applied in particular circumstances because it interfered with an individual’s exercise of those rights.” *Id.*
26. A party bringing an “as-applied” challenge contends that the statute would be unconstitutional under the circumstances in which the party has acted or proposes to act. *Sanger v. Dennis*, 148 P.3d 404, 410 (Colo.App. 2006). “If a statute is held unconstitutional ‘as-applied,’ the statute may not be applied in the future in a similar context, but the statute is not rendered completely inoperative.” *Id.*
27. In contrast, a “facial” constitutional challenge is used when a party seeks to render a statute utterly inoperative. *Id.* at 411. “Facial challenges must be rejected ‘unless there exists *no set of circumstances* in which the statute can constitutionally be applied.’” *Id.* citing *Olmer v. City of Lincoln*, 23 F.Supp.2d 1091, 1104 (D.Neb. 1998) quoting *Ada v. Guam Soc’y of Obstetricians 7 Gynecologists*, 506 U.S. 1011, 1012 (1992)(Scalia, J., dissenting) (emphasis in original).
28. “A facial challenge to a statute or rule cannot succeed unless the party challenging it has established the asserted invalidity beyond a reasonable doubt.” *Sanger v. Dennis, supra*, at 411. “However, the same is not true of an “as-applied’ challenge.” *Id.*
29. The First Amendment to the United States Constitution provides that “Congress shall make no law ... abridging the freedom of speech” *Lewis v. Colorado Rockies Baseball Club, Ltd.*, 941 P.2d 266, 271 (Colo. 1997). The free speech provision of the First Amendment applies to the states through the Fourteenth Amendment to the United States Constitution. *People v. Ryan*, 806 P.2d 935, 937, n. 2 (Colo. 1991).

30. Under federal constitutional jurisprudence, the analysis of a governmentally imposed restriction of speech “begins with an inquiry into the nature of the property affected by the regulation.” *Denver Publishing Co. v. City of Aurora*, 896 P.2d 306, 309 (Colo. 1995); see also *Cornelius v. NAACP Legal Defense & Educ. Fund, Inc.*, 473 U.S. 788, 800 (1985) (“[T]he extent to which the Government can control access [to its property] depends on the nature of the relevant forum.”); *Perry Educ. Ass'n v. Perry Local Educators' Ass'n*, 460 U.S. 37, 44 (1983) (“The existence of a right of access to public property and the standard by which limitations upon such a right must be evaluated differ depending on the character of the property at issue.”).
31. In *Perry*, the Supreme Court articulated three categories of public forum property: (1) a traditional public forum property; (2) a designated public forum property; and (3) remaining public property. *Perry*, 460 U.S. at 45-46. The first category, a traditional public forum, includes places which “‘have immemorially been held in trust for the use of the public and ... have been used for purposes of assembly, communicating thoughts between citizens, and discussing public questions.’” *Id.* at 45 (quoting *Hague v. Comm. for Indus. Org.*, 307 U.S. 496, 514 (1939)). Thus, public places “historically associated with the free exercise of expressive activities, such as streets, sidewalks, and parks, are considered, without more, to be ‘public forums.’” *United States v. Grace*, 461 U.S. 171, 177 (1983). In a traditional public forum, content-neutral restrictions of free speech are considered reasonable time, place, and manner regulations if they are narrowly tailored to serve a significant government interest, and leave open ample alternative channels of communication. See *id.* Restrictions affecting public forum property that are not content-neutral, however, must be necessary to serve a compelling state interest and must be narrowly drawn to achieve that end. See *Perry*, 460 U.S. at 45.
32. The second category articulated in *Perry* consists of government property that has been opened to the public as a place for expressive activity. *Perry*, 460 U.S. at 45. Whether a forum has been designated for expressive activity is determined by the state's intent in establishing the forum. See *Cornelius*, 473 U.S. at 802. A state is not required to keep such a facility open to the public indefinitely. However, so long as a designated public forum remains open, it is bound by the same standards as apply to a traditional public forum. See *Perry*, 460 U.S. at 46. Thus, “[r]easonable time place and manner regulations are permissible, and a content-based prohibition must be narrowly drawn to effectuate a compelling state interest.” *Id.*
33. The final *Perry* category consists of public property that “is not by tradition or designation a forum for public communication.” *Perry*, 460 U.S. at 46. Limitations on expressive activities in a non-public forum “need only be reasonable as long as the regulation is not an effort to suppress the speaker's activities due to disagreement with the speaker's views.” *International Soc'y for Krishna Consciousness, Inc. v. Lee*, 505 U.S. 672, 679 (1992).

34. There is no dispute that the Defendant was talking to the alleged victims on a public sidewalk. The public sidewalk adjoining the facility is a traditional public forum. *Lewis v. Colorado Rockies Baseball Club, Ltd., supra*, at 274-275; *see also, Cannon v. City and County of Denver*, 998 F.2d 867, 871 (10th Cir. 1993)(holding that public sidewalk outside Rocky Mountain Planned Parenthood abortion facility was a traditional public forum).
35. “A regulation or restriction on expressive activity is deemed content-neutral if it is ‘justified without reference to the content of the regulated speech.’” *Lewis v. Colorado Rockies Baseball Club, Ltd., supra*, at 275 (quoting *Ward v. Rock Against Racism*, 491 U.S. 781, 791 (1989)). C.R.S. § 18-9-122 as applied is not a content neutral time place and manner restriction as applied to Defendant.
36. C.R.S. § 18-9-122(3) prohibits a person from entering the eight foot “bubble” only if that person is going to pass a leaflet or handbill to, displaying a sign to, or engaging in “oral protest, education, or counseling” with a person in the public way or sidewalk. Defendant was not passing leaflets or handbills, or displaying a sign, to the alleged victims, so those activities and types of expression are not at issue in this case. C.R.S. § 18-9-122(3) itself does not specify any particular topic of “oral protest, education, or counseling” that is prohibited. However, C.R.S. § 18-9-122(1) refers to the “exercise of a person’s right to protest or counsel against certain medical procedures” is what the legislation is aimed at. “Education” within the eight-foot bubble is not mentioned in C.R.S. § 18-9-122(1). Apparently all speech that a police officer, victim or court would find after the fact amounted to “education” is prohibited, whether or not it relates to abortion or some medical procedure the alleged victim is entering the particular “health care facility” for. Thus, Defendant, as long as she did not physically interfere with the alleged victim’s entrance to the Facility, could walk along side or behind the alleged victim within eight feet and say nothing, or talk about the weather, the Democratic National Convention coming to town, investing in real estate, or any other topic so long as the content of her speech did not cross over into the forbidden area of “oral protest, education, or counseling” about “certain medical procedures,” or was not deemed by the authorities to be “education”.
37. The United States Supreme Court specifically stated that an individual would not be in violation of C.R.S. § 18-9-122 if she was merely following behind persons entering an abortion clinic and inadvertently entered the eight-foot bubble. *Hill v. Colorado*, 530 U.S. at 727.
38. The restriction on the “exercise of a person’s right to protest or counsel against certain medical procedures” is a content based restriction on speech as applied to the Defendant. *CF&I Steel, L.P. v. United Steel Workers of America*, 23 P.3d 1197, 1201-02 (Colo. 2001)(prohibition against residential picketing intended to cover only picketing related to labor disputes is not content-neutral on its face).

39. So long as the Defendant is not physically interfering with access to a “health care facility” or attempting to physically come in contact with the alleged victim as the alleged victim enters the “health care facility,” the person entering the Facility has unobstructed access to the “health care facility” and the State cannot show a compelling reason for prohibiting Defendant’s speech on any topic, regardless of whether or not her speech is “oral protest, education, or counseling” on certain medical procedures”. See, *Hill v. Colorado*, 530 U.S. at 746, Scalia, J. and Thomas, J. in dissent.
40. As applied to the Defendant herein, C.R.S. § 18-9-122 does not provide Defendant with adequate alternative avenues to convey her message. Defendant has found that yelling or raising her voice from a distance of more than eight feet or displaying a sign does not allow her to form the necessary emotional connection with the person that would allow Defendant to express her speech and viewpoint. Defendant has found through years of experience that persons entering an abortion facility are responsive to a calm, quiet presentation, but are repelled by yelling and signs in their faces.
41. “A statute is facially overbroad if it sweeps within its reach constitutionally protected, as well as unprotected, activities.” *People v. Ryan, supra*, at 939. As a result, “overbreadth scrutiny is necessarily controlled by the rule that a law should not be voided on its face unless its ‘chilling effect’ on constitutionally protected activity is substantial.” *Id.* “If a statute is not substantially overbroad, then whatever overbreadth may exist should be resolved on a case-by-case basis.” *Id.* at 939 – 40. C.R.S. § 18-9-122 as applied is overbroad in that it is being enforced against Defendant in a manner not needed to insure unobstructed access to an abortion clinic and in a manner that does leave Defendant with adequate alternate avenues to present her message.
42. The United States Supreme Court upheld C.R.S. § 18-9-122 against the facial challenge, in part, because it felt the authorities would “exercise some degree of police judgment” in enforcing the statute. *Hill v. Colorado*, 530 U.S. at 733. However, it is clear that this did not happen in this case. Defendant was issued her summons some two months after the fact by police officers who did not even witness the alleged intrusion into the “bubble”.
43. C.R.S. § 18-9-122 is unconstitutionally vague as applied to the Defendant. Defendant cannot tell what type of “protest, education, or counseling” is prohibited. C.R.S. § 18-9-122(1) refers to “protest or counseling against certain medical procedures.” Obviously, the prohibition does not apply to all medical procedures, or the word “certain” would not have been included. Defendant cannot not tell in advance of speaking what “medical procedures” amount to prohibited speech about “certain medical procedures.” If Defendant speaks to a women entering an abortion facility about what is involved in the “medical” procedure to abort the unborn baby, no doubt

the Defendant would be arrested for violating C.R.S. § 18-9-122. But what if Defendant talked to the woman about lap-band surgery for weight loss? Would Defendant have violated C.R.S. § 18-9-122?

C.R.S. § 18-9-122(3) AS APPLIED TO THE DEFENDANT IS UNCONSTITUTIONAL UNDER ARTICLE II, SECTION 10 OF THE COLORADO CONSTITUTION

44. The First Amendment is framed solely in the negative: no law shall be made abridging the freedom of speech or of press. In contrast, Article II, Section 10 of the Colorado Constitution advances beyond the negative command of its first clause to make an affirmative declaration in the second clause. The complete text of our free speech article is as follows:

No law shall be passed impairing the freedom of speech; *every person shall be free to speak, write or publish whatever he will on any subject*, being responsible for all abuse of that liberty; and in all suits and prosecutions for libel the truth thereof may be given in evidence, and the jury, under the direction of the court, shall determine the law and fact.

Bock v. Westminster Mall Co., 819 P.2d 55, 58 (Colo. 1991).

45. For more than a century, the Colorado Supreme Court has held that Article II, Section 10 of the Colorado Constitution guarantees greater protection of the Defendant's right of speech than is guaranteed by the First Amendment. *Id.* at 59.
46. Where the First Amendment provides adequate protection of the speech at issue, the Colorado courts have in the past declined to consider the greater protection provided by Article II, Section 10. *Lewis v. Colorado Rockies Baseball Club, supra*, at 271-72; *Holliday v. Regional Transportation District*, 43 P.2d 676, 681 (Colo.App. 2001).
47. If this court should find that C.R.S. § 18-9-122 is not unconstitutional as applied to the Defendant, C.R.S. § 18-9-122 is still unconstitutional as applied to the Defendant under Article II, Section 10. This is because even if the State of Colorado has a significant, or even compelling, reason under the First Amendment for enacting C.R.S. § 18-9-122 and applying it to the Defendant, it must have an even higher and more compelling reason to overcome the greater protection for freedom of speech provided by Article II, Section 10.
48. Indeed, if the State of Colorado has such a "super compelling" reason, it must be only that of prevent a breach of the peace and allowing the alleged "victim" to exercise the federal constitutional right to an abortion. This can be accomplished without the

necessity of infringing Defendants greater free speech rights under Article II, Section 10 by making it a crime to physically prevent a person from entering an abortion facility or a medical facility. The alleged “victim” is already protected from assault by other criminal statutes (*e.g.*, C.R.S. §§ 18-3-201, *et. seq.*) and it is not necessary for the State of Colorado to infringe Defendant’s free speech rights under Article II, Section 10.

49. There are no allegations in this case that Defendant attempted or actual did physically assaulted the alleged “victims” or physically prevent the alleged “victims” from entering the Facility. There are no allegations that the Defendant attempted or succeeded in causing a breach of the peace. Absent such conduct by Defendant, charging her under C.R.S. § 18-9-122 violates her right to free speech under Article II, Section 10.
50. There is no dispute that the Defendant was talking to the alleged victims on a public sidewalk. The public sidewalk adjoining the facility, whether it is called a “traditional public forum” or something else under Article II, Section 10, is the type of public place that has been traditionally devoted to the exercise of free speech under Article II, Section 10, just as it s has under First Amendment jurisprudence. *See, Lewis v. Colorado Rockies Baseball Club, Ltd., supra*, at 274-275; *see also, Cannon v. City and County of Denver*, 998 F.2d 867, 871 (10th Cir. 1993)(holding that public sidewalk outside Rocky Mountain Planned Parenthood abortion facility was a traditional public forum).
51. C.R.S. § 18-9-122(3) prohibits a person from entering the eight foot “bubble” only if that person is going to pass a leaflet or handbill to, displaying a sign to, or engaging in “oral protest, education, or counseling” with a person in the public way or sidewalk. Defendant was not passing leaflets or handbills, or displaying a sign, to the alleged victims, so those activities and types of expression are not at issue in this case. C.R.S. § 18-9-122(3) itself does not specify any particular topic of “oral protest, education, or counseling” that is prohibited. However, C.R.S. § 18-9-122(1) refers to the “exercise of a person’s right to protest or counsel against certain medical procedures” is what the legislation is aimed at. “Education” within the eight-foot bubble is not mentioned in C.R.S. § 18-9-122(1). Apparently all speech that a police officer, victim or court would find after the fact amounted to “education” is prohibited, whether or not it relates to abortion or some medical procedure the alleged victim is entering the particular “health care facility” for. Thus, Defendant, as long as she did not physically interfere with the alleged victim’s entrance to the Facility, could walk along side or behind the alleged victim within eight feet and say nothing, or talk about the weather, the Democratic National Convention coming to town, investing in real estate, or any other topic so long as the content of her speech did not cross over into the forbidden area of “oral protest, education, or counseling” about “certain medical procedures,” or was not deemed by the authorities to be “education”.

52. The restriction on the “exercise of a person’s right to protest or counsel against certain medical procedures” is a content based restriction on speech as applied to the Defendant. *CF&I Steel, L.P. v. United ‘Steel Workers of America*, 23 P.3d 1197, 1201-02 (Colo. 2001)(prohibition against residential picketing intended to cover only picketing related to labor disputes is not content-neutral on its face). *CF&I Steel* dealt with a First amendment analysis. Even though a majority on the United States Supreme Court erroneously decided that under C.R.S. § 18-9-122 there was no restriction based on content for First Amendment purposes (*see Hill v. Colorado*, 530 U.S. at 746 (Scalia, J. & Thomas, J., dissenting)), the restriction is certainly content based under the greater free speech protection afforded by Article II, Section 10.
53. So long as the Defendant is not physically interfering with access to a “health care facility” or attempting to physically come in contact with the alleged victim as the alleged victim enters the “health care facility,” the person entering the Facility has unobstructed access to the “health care facility” and the State cannot show a compelling reason, let alone a “super” compelling reason, for prohibiting Defendant’s speech on any topic, regardless of whether or not her speech is “oral protest, education, or counseling” on certain medical procedures”. *See, Hill v. Colorado*, 530 U.S. at 746, Scalia, J. and Thomas, J. in dissent.
54. As applied to the Defendant herein, C.R.S. § 18-9-122 does not provide Defendant with adequate alternative avenues to convey her message. Defendant has found that yelling or raising her voice from a distance of more than eight feet or displaying a sign does not allow her to form the necessary emotional connection with the person that would allow Defendant to express her speech and viewpoint. Defendant has found through years of experience that persons entering an abortion facility are responsive to a calm, quiet presentation, but are repelled by yelling and signs in their faces. Article II, Section 10 allows for speech in places where the First amendment does not or does not apply. *See, Bock v. Westminster Mall Co.*, *supra*, at 59 (holding that Article II, Section 10 protects free speech in private shopping mall even though First Amendment does not).
55. “A statute is facially overbroad if it sweeps within its reach constitutionally protected, as well as unprotected, activities.” *People v. Ryan*, *supra*, at 939. As a result, “overbreadth scrutiny is necessarily controlled by the rule that a law should not be voided on its face unless its ‘chilling effect’ on constitutionally protected activity is substantial.” *Id.* “If a statute is not substantially overbroad, then whatever overbreadth may exist should be resolved on a case-by-case basis.” *Id.* at 939 – 40. C.R.S. § 18-9-122 as applied is overbroad in that it is being enforced against Defendant in a manner not needed to insure unobstructed access to an abortion clinic and in a manner that does leave Defendant with adequate alternate avenues to present her message. *People v. Ryan* was decided under the First Amendment. The First Amendment is a floor, guaranteeing a high minimum of free speech. *Bock v. Westminster Mall Co.*, *supra*, at 59. Even if C.R.S. § 18-9-122 is found by this court

not to be overbroad under the First Amendment as applied to the Defendant, it is overbroad under the greater protection afforded by Article II, Section 10. This is because elimination of Defendant's peaceful speech within the "bubble" is not necessary to accomplish the "super" compelling purpose of preventing a breach of the peace and allowing access to an abortion facility.

56. Under Article II, Section 10, C.R.S. § 18-9-122 is unconstitutionally vague as applied to the Defendant. Defendant cannot tell what type of "protest, education, or counseling" is prohibited. C.R.S. § 18-9-122(1) refers to "protest or counseling against certain medical procedures." Obviously, the prohibition does not apply to all medical procedures, or the word "certain" would not have been included. Defendant cannot not tell in advance of speaking what "medical procedures" amount to prohibited speech about "certain medical procedures." If Defendant speaks to a women entering an abortion facility about what is involved in the "medical" procedure to abort the unborn baby, no doubt the Defendant would be arrested for violating C.R.S. § 18-9-122. But what if Defendant talked to the woman about lap-band surgery for weight loss? Would Defendant have violated C.R.S. § 18-9-122?

WHEREFORE, the Defendant respectfully requests that all charges against her be dismissed.

DATED this __th day of March, 2008.

ROUSE LAW OFFICE

By: _____
James P. Rouse, Atty. Reg. #10675

CERTIFICATE OF SERVICE

I do hereby certify that on this __th day of March, 2008, a true and correct copy of the above *Motion to Dismiss* was served by depositing the same in the United States Mail, first-class postage pre-paid, addressed to:

District Attorney's Office
County Court Division
201 W. Colfax Ave.
Dept. 801
Denver, CO 80202

John William Suthers
Office of the Colorado Attorney General
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