

**NOTICE OF CLAIM**

**COLORADO GOVERNMENTAL IMMUNITY ACT**

TO:

Larimer County Sheriff's Office  
2501 Midpoint Drive  
Fort Collins, Colorado 80525

Fort Collins Police Services  
2221 South Timberline Road  
Fort Collins, Colorado 80525

City of Fort Collins  
City Hall West  
300 Laporte Avenue  
Fort Collins, Colorado 80522

Eighth Judicial District  
Larimer County Justice Center  
201 Laporte Avenue  
Fort Collins, Colorado 80521

Office of the Attorney General  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, Tenth Floor  
Denver, Colorado 80203

**NOTICE IS GIVEN OF THE FOLLOWING CLAIM**  
**UNDER C.R.S. 24-10-109:**

Name and Address of Claimant:

Stacy Lynne  
305 West Magnolia Street #282  
Fort Collins, Colorado 80521

Statutory requirements for filing a claim under the Colorado Governmental Immunity Act within 180 days of discovery of the injuries have been satisfied here.

Please be advised that this letter constitutes notice of Stacy Lynne's claims under the provisions of C.R.S. 24-10-101, *et seq.*

## **1. Concise Statement of the Factual Basis of the Claims**

On Tuesday, March 17, 2015, City of Fort Collins Councilor Wade Troxell stated during the televised City Council meeting that an investigation related to alleged crimes reported by Stacy Lynne that were committed by Sheriff Justin Smith, District Attorney Larry Abrahamson, and Judge Julie Kunce Field had been completed. Colorado Open Records Access (CORA) requests were filed on March 23, 2015 with the City of Fort Collins and Fort Collins Police Services for the purposes of gaining access to the investigation. Both CORA requests were answered by saying there were no records of an investigation. An email was sent to Troxell on March 25, 2015 that asked him to provide the name of the investigating agency, the investigating officer, the date of the investigation, and the subject of that investigation. Mr. Troxell did not respond to that email.

Fort Collins Police Services suggested an open records request should be filed with the Larimer County Sheriff's Office because they said that was the agency that investigated the alleged crimes. However, the Fort Collins Police Service then changed their story and said it was not the Larimer County Sheriff's Office that investigated.

On Tuesday, April 21, 2015, even though the City of Fort Collins and Fort Collins Police Services responded to CORA requests by stating in writing that there was no record of an investigation, Mayor Troxell re-stated his position from March 17, 2015, that there was an investigation and he considered the matter closed.

On Tuesday, April 28, 2015, an email was sent to Mayor Troxell repeating the request for the name of the investigating agency, the case number, the investigating officer's name, and all records he had seen related to the investigation. The email also contained information regarding a pending defamation lawsuit against Mayor Troxell for his repeated public statements that there was an investigation in spite of legal answers from the City of Fort Collins and Fort Collins Police Services saying no investigation existed. Mayor Troxell did not respond to that email.

On Wednesday, April 29, 2015, less than 24 hours after the email was sent to Mayor Troxell regarding an imminent lawsuit for defamation, the records manager for Fort Collins Police Services called to report that she had just discovered documents related to the investigation that they previously claimed did not exist. The release of these previously undiscoverable documents on April 29, 2015, (undiscoverable because the City of Fort Collins said they did not exist), begins the 180 day filing period for Colorado Governmental Immunity Act Claims.

The suddenly found records of the "investigation" into Sheriff Justin Smith, District Attorney Larry Abrahamson, and Judge Julie Kunce Field included: an unsigned and undated letter from Fort Collins Police Chief John Hutto; a memorandum from an officer; and a narrative.

The “investigation” at issue was a result of two actions commenced by Stacy Lynne: (1) filing reports of crimes with Fort Collins Police Services and (2) a meeting between Police Chief John Hutto, Mayor Karen Weitkunat and others. The reported crimes involved alleged illegal actions by Sheriff Justin Smith (statutory violations of stalking, harassment, intimidation), Judge Julie Kunce Field (statutory child abuse), and District Attorney Larry Abrahamson (statutory defamation).

The findings of that investigation illustrate that the sheriff did stalk, harass, and intimidate Stacy Lynne, that the district attorney and others did spread malicious lies about Stacy Lynne, and that the judge did commit statutory child abuse.

The investigator, Fort Collins Police Services Officer Wendy Slaughter, failed to exercise reasonable care during the investigation in the following ways: (1) she did not verify whether the statements made by the sheriff, judge and district attorney were accurate; (2) she did not question or interview Stacy Lynne, the victim who reported the alleged crimes after she spoke to the alleged criminals; (3) she did not look at the evidence that was available in the case. If Officer Slaughter had exercised due care in this investigation, she would have read the official court record, compared the evidence that exists against the statements made by the alleged criminals, and then she would have conducted a second interview with Stacy Lynne based on information she had gathered in the investigation.

Officer Slaughter knew at the time of her investigation that Sheriff Justin Smith had violated Stacy Lynne’s civil rights. However, this fact does not seem to enter into Slaughter’s investigative methods. For example, when a suspect is caught lying, the investigating officer will reasonably question the credibility of the suspect. Slaughter, acting with reasonable care for the duties of her position, would pursue criminal charges against Sheriff Smith for stalking, harassment and intimidation as related to the unwarranted GPS tracking device.

Additionally, in violation of standard investigative methods and law enforcement protocol, Officer Slaughter discussed the case with the other alleged offenders as though they were not suspects but were instead reliable resources. Specifically, reasonable investigators would doubt the credibility of a sheriff’s statements in an investigation because the sheriff concurrently admitted to violating the victim’s civil rights and breaking the law.

Sheriff Smith used the investigation to again defame Ms. Lynne when he provided false information to a law enforcement officer because he was attempting to divert attention from the illegally attached GPS tracking device. And still, Officer Slaughter did not take action against Sheriff Justin Smith as prescribed by law, statutes, and procedures of criminal law.

As a result of Officer Slaughter’s deviation from standard investigative methods, her report and Officer David Hart’s memorandum enabled the slander, libel, domestic violence, child abuse, harassment, intimidation and other crimes to continue and proliferate against Stacy Lynne and Jaden. Those reports set the tone of the case that continues today...the judge, sheriff and district attorney were knowingly dishonest during the investigation so that each time Ms. Lynne filed a

report with law enforcement or appeared in court, Ms. Lynne was treated with prejudice and bias.

Merely accepting the alleged offenders' statements as being true (simply because those alleged offenders hold seats of power and the public trust) is a violation of basic investigative methods.

On April 24, 2015, District Attorney Cliff Reidel, Sheriff Justin Smith and other officials participated in a public forum to educate the people about the Fourth Amendment of the Constitution. Information provided by District Attorney Cliff Reidel shows that he and Sheriff Justin Smith knew that attaching a GPS tracking device to a vehicle without a warrant was a civil rights violation. Further, Sheriff Justin Smith used his power and authority of holding the highest elected law enforcement position in the county to track Ms. Lynne for no other reason than to harass, intimidate and defame her.

*The "investigation" as referenced above and the violations committed by the public servants associated with that investigation have renewed the relevance and legal timeliness of the information that is included below.*

On August 11, 2011, during a conversation with a woman inside the Larimer County Justice Center, Ms. Lynne was surrounded by three deputies from the Larimer County Sheriff's Office. The deputies refused to explain why they were surrounding her.

On December 19, 2011, Stacy Lynne, mother of Jaden, went to Jaden's school to pick him up at the end of the school day. At that time, Stacy Lynne was the primary custodial parent and had been for the entirety of Jaden's life, eight years and eight months. When Stacy Lynne arrived to pick up Jaden, Jaden was curled into a ball with his biological father, Jeffrey Pappenheim, standing over him. When Jaden saw his Mother, Jaden told his mother to run away out of fear of Pappenheim. Ms. Lynne then proceeded to run with Jaden and leave the school. Pappenheim and bystanders yelled out there was a court order. Ms. Lynne informed them as she was leaving that she had not been notified of any court order.

On December 19, 2011, at 5:37 PM, an order was filed by Judge Julie Kunce Field, District Court Judge of the District Court, County of Larimer, State of Colorado. The order was issued upon a hearing that was held on November 15, 2011, during which many Colorado Rules of Civil Procedure and Evidence were violated. Ms. Lynne's rights were violated during the hearing, including the total disregard of evidence of domestic violence perpetrated by Pappenheim against Stacy Lynne and Jaden.

The order was never provided to Ms. Lynne on December 19, 2011 or December 20, 2011. Ms. Lynne took it upon herself to find out if an order was issued by going to the Larimer County Justice Center on December 21, 2011. At that time, Ms. Lynne requested the case file from the court and made her own copy of the court order. As Ms. Lynne attempted to leave the courthouse, she was approached by Officer Van Hook, who then gave Ms. Lynne a copy of the court order and harassed Ms. Lynne regarding the court order by accusing her of intending to

violate the order and threatening to arrest her. Ms. Lynne immediately went to Fed-Ex/Kinko's to prepare an emergency injunction since there has been a history of domestic violence against her and her son, including threats by Pappenheim to kill both Ms. Lynne and Jaden, with additional acts of violence against them. To ensure the Sheriff's Office was aware she had no intentions to violate the law, Ms. Lynne notified the Sheriff's Office with a phone call that she was at Fed-Ex/Kinko's merely typing an injunction in order to prevent harm to her son due to the court system's disregard of evidence and history of Pappenheim's domestic violence.

The Larimer County Sheriff's Office and its employees colluded to deprive Ms. Lynne of her Constitutional and State Rights by (1) falsely alleging probable cause for an arrest warrant, (2) arresting Ms. Lynne without a valid arrest warrant, (3) arresting Ms. Lynne without probable cause of committing any crime, (4) arresting Ms. Lynne on belief of violation of court order without following court procedures regarding contempt of court, (5) depriving Ms. Lynne of her right to a contempt hearing before a judge prior to being arrested for contempt of a court order; (6) depriving Ms. Lynne of her right to privacy by wrongly obtaining a wiretap on her cell phone that was not issued by order of a judge, and that was based on false allegations.

Upon Ms. Lynne's immediate request for proof of an arrest warrant, Sergeant Van Hook refused to produce any warrant showing he had authority to arrest Ms. Lynne while inside Fed-Ex/Kinkos. Ms. Lynne had not committed any crime that would provide probable cause for an arrest warrant, or arrest without warrant; nor had Ms. Lynne harbored any intent to commit a crime that would provide probable cause for an arrest warrant or arrest without a warrant. Furthermore, violation of a court order requires a specific procedure for contempt, including a hearing and an order of contempt to be issued by a judge before an arrest may be made upon a person in contempt of a court order. In fact, Ms. Lynne had informed the Larimer County Sheriff's Office of her intent to type an immediate injunction that needed to be filed as soon as possible for the safety of the minor child, which is not a crime. Moreover, Ms. Lynne honestly provided her location to the Larimer County Sheriff's Office, which showed there was no danger of her attempt to leave the jurisdiction. The Larimer County Sheriff's Office colluded to use this information to find Ms. Lynne and deprive her of her civil rights.

Ms. Lynne was falsely imprisoned against her will and against the law in the Larimer County Jail without bond until her family brought Jaden to the Sheriff's Office. The Larimer County Sheriff's Office then denied release of Ms. Lynne until they received payment of a \$1,500.00 cash bond plus \$40.00 fee. She paid the bond and was released.

Later, it was determined by the court that there was no evidence showing Ms. Lynne had committed any crime and she was never charged with any crime.

On December 20, 2011, at 10:07 PM, Sergeant John J. Feyen issued, in violation of procedure and law, of his own accord and without consulting any supervisor as is required on the form, an Exigent Circumstance Request Form and, thereby, falsely alleged (a) immediate danger of death or serious physical injury to any person, (b) conspiratorial activities threatening the national security interest, or (c) conspiratorial activities characteristic of organized crime, and that Ms. Lynne fled with Jaden.

First, this Form was issued 12 hours before Ms. Lynne received the court order, thus the alleged justification for this tap was blatantly untrue for Ms. Lynne had yet to be served a court order from which to flee. Second, even when Ms. Lynne did receive the court order more than 40 hours after the order was filed, she still did not flee with Jaden. As is documented on video and on YouTube, Ms. Lynne merely went from the courthouse to Fed-Ex/Kinkos to type an injunction which was necessary under the circumstances to be filed immediately. Third, nowhere in the facts and circumstances of this case has there ever been any allegations or evidence that Ms. Lynne represented an immediate danger of death or serious physical injury her son Jaden. In fact, Ms. Lynne was the only source of care for Jaden during his eight years and eight months. Thus, the wiretap was requested and issued in violation of Ms. Lynne's rights.

On May 2, 2012, a Colorado State University police officer drove his motorcycle onto a jogging track where Ms. Lynne was exercising. There were no other people on the jogging track or anywhere near the area. The officer entered the jogging track just behind Ms. Lynne, drove his motorcycle slowly for a complete lap and then exited just behind Ms. Lynne. As the officer drove his motorcycle around the track, he maintained his head position in the direction of Ms. Lynne.

On May 3, 2012, Ms. Lynne discovered a GPS tracking device attached to her vehicle. The device was delivered to the Weld County Sheriff's Office for identification on May 4, 2012. The serial numbers were traced back to the Larimer County Sheriff's Office, who claimed to have attached the device to the car four months prior. Sheriff Justin Smith said there was no warrant for the device. Sheriff Smith told the *Fort Collins Coloradoan* that the tracking device was attached in an exigent circumstance out of fear for a child's safety. However, Sheriff Smith knew he was misleading the news reporter because the sheriff had full knowledge that Ms. Lynne had not been served a court order, nor was there any history of Ms. Lynne being a danger to her son Jaden. Sheriff Smith also knew that if such an exigent circumstance were real, a warrant would have been issued within hours. Instead, Sheriff Smith left the device attached for months without a warrant. Therefore, there was no probable cause to justify a warrant being issued for the GPS tracking device to be attached to Ms. Lynne's vehicle. The *Fort Collins Coloradoan* Editorial Board, in a published opinion, suggested that the GPS tracking device was placed on Ms. Lynne's car as an act of retaliation by the sheriff.

The attachment of a GPS tracking device without probable cause, without a warrant that was left in place for at least four months constitutes defamation because reasonable people automatically assume that Ms. Lynne must have done something wrong or she wouldn't have a tracking device on her car.

On September 13, 2012 Julie Kunce Field conducted a hearing at the Larimer County Justice Center. She claimed that Ms. Lynne refused to attend the hearing. Ms. Lynne was not notified there was a hearing. Corporal Ryan Berg reported that Judge Julie Kunce Field was not in the building at the time that the judge claimed she was having a hearing. Corporal Ryan Berg filed an incident report that was in opposition to what Judge Julie Kunce Field reported. During that secret hearing, Judge Julie Kunce Field forced an attorney to act on Ms. Lynne's behalf, even though that attorney was not retained by Ms. Lynne. Corporal Ryan Berg was released from his duties at the Larimer County Sheriff's Office shortly after this incident.

Judicial Administrator Janelle Brunin has witnessed numerous failures by the Eighth Judicial District to notify Ms. Lynne of court proceedings as is required by Colorado court procedures, rules, statutes and laws. Ms. Brunin has acknowledged that Ms. Lynne has not been served court orders. Ms. Brunin is aware that Ms. Lynne has not received notification of court proceedings because an unknown entity within the court system changed Ms. Lynne's contact information so that documents would be mailed to a foreign address. Ms. Brunin is aware that magistrates routinely fail to issue timely orders as required by Colorado court procedures, rules, statutes and laws so that Ms. Lynne is prevented from preparing for court proceedings.

Magistrates and judges in the Eighth Judicial District routinely state that the United States Constitution is not relevant, nor is Constitutional law allowed to be referenced in court proceedings.

District Attorney Larry Abrahamson and Judge Julie Kunce Field falsely and repeatedly, in writing, and in oral statements, claimed that Stacy Lynne had declared herself a "sovereign citizen". Ms. Lynne was unaware of the meaning behind that terminology until after friends and business associates heard the rumor and became concerned. Being falsely labeled a "sovereign citizen" carries with it extraordinary malice, considering that law enforcement officers are especially wary of so-called "sovereign citizens". That defamatory statement and the damages it causes is compounded by the fact that the district attorney and the judge are powerful people who hold a community's trust. When the sheriff, a district attorney or a judge says something, most people believe what they are saying to be true.

## 2. Nature and Extent of Claimant's Injuries

Stacy Lynne's civil rights were willfully and wantonly violated as described below:

- (a) Sheriff Justin Smith, District Attorney Larry Abrahamson, and Judge Julie Kunce Field knowingly and with malice made defamatory statements, repeatedly and on different occasions, about Stacy Lynne, in violation of Colorado Revised Statutes (C.R.S.) § 18-13-105. Those defamatory statements were published in television news reports and written in newspapers.
- (b) Sheriff Justin Smith, District Attorney Larry Abrahamson, and Judge Julie Kunce Field abused the power of their offices by fabricating information they then disseminated about Stacy Lynne.
- (c) The "investigation" that the City of Fort Collins and Fort Collins Police Services claimed did not exist and then materialized after notice of imminent lawsuit contains evidence that verifies that the alleged crimes reported by Stacy Lynne against Sheriff Justin Smith, District Attorney Larry Abrahamson, and Judge Julie Kunce Field did occur. This is the reason the "investigation" was illegally hidden from Colorado Open Records Access requests.
- (d) Sheriff Justin Smith and District Attorney Cliff Reidel sat on a panel in a public forum on April 24, 2015. The topic of that forum was the Fourth Amendment of the United States Constitution. Sheriff Smith and District Attorney Reidel, through comments made at the public forum, admitted to possessing the knowledge that placement of a GPS tracking device on a private vehicle without probable cause and without a warrant would be a Constitutional violation of the Fourth Amendment.
- (e) Stacy Lynne was deprived of her right to privacy when a GPS tracking device was attached to her vehicle, without a probable cause, without a warrant, and left in place for at least four months.
- (f) Stacy Lynne was deprived of her right to due process of law because of misinformation, inaccurate and defamatory statements made and widely disseminated by Larimer County, Colorado public servants and government actors.
- (g) Stacy Lynne was arrested without a probable cause, in violation of C.R.S. §16-3-102 and §16-3-108.
- (h) Stacy Lynne was arrested without a valid arrest warrant, of which probable cause was falsely alleged, in violation of §16-3-108.
- (i) Stacy Lynne was not provided a Contempt Hearing, alleging her violation of a Court Order, nor was any Order of Contempt issued by a Court, allowing Ms. Lynne's arrest according to the Child Custody Order, in violation of Colorado Rules of Civil Procedure (C.R.C.P.) 107(6)(c).
- (j) Stacy Lynne was deprived of her right to privacy when a wiretap was issued upon her cell phone according to false allegations and not according to proper procedure, in violation of C.R.S. §16-15-102.

- (k) Stacy Lynne was deprived of her fundamental rights when she was denied fair and equal access to the courts and further denied protection for her safety and Jaden's safety by law enforcement.
- (l) Stacy Lynne has been deprived of her rights as a direct result of intentional misinformation and lies that Judge Julie Kunce Field, District Attorney Larry Abrahamson, and Sheriff Justin Smith spread in the public arena and amongst their peers throughout the State of Colorado.
- (m) The City of Fort Collins, Fort Collins Police Services, the Larimer County Sheriff's Office, and the Eighth Judicial District conspired to cover up their years' long harassment, intimidation, and defamation against Stacy Lynne by claiming documentation related to an investigation did not exist.
- (n) The City of Fort Collins, Fort Collins Police Services, the Larimer County Sheriff's Office, and the Eighth Judicial District conspired to deprive Stacy Lynne of her civil rights by preventing fair and just access to the courts.
- (o) The Eighth Judicial District through repeated violation of court procedures, judicial rules, statutes, and the law, prevented Stacy Lynne from participating fairly in the legal system process.
- (p) Stacy Lynne has been deprived of her right to due process of law and Constitutional protections due to the regular practice by Eighth Judicial District judges and magistrates of prohibiting Constitutional law in court proceedings.
- (q) Stacy Lynne has been deprived of due process of law by magistrates and judges who illegally prohibit evidence from being presented and witnesses from testifying in court proceedings.
- (r) Stacy Lynne has been deprived of her right to access justice when numerous legally and properly filed lawsuits were dismissed by judges in violation of Colorado court rules, Colorado Judicial Canons, court proceedings, statutes and the law. Related to this claim, Weld County District Court Judge Shannon Lyons issued an order that Larimer County abide by the law.
- (s) Stacy Lynne has been deprived of her right to access law enforcement services because of Fort Collins Police Officers' violations of standards of care in investigative methods.
- (t) Sheriff Justin Smith, District Attorney Larry Abrahamson, Judge Julie Kunce Field abused the power of their positions by defaming Ms. Lynne. The force of their lies in the public mindset were compounded explicitly because of the public offices they hold. Three of the most powerful people in Larimer County harass, intimidate, and defame Ms. Lynne with the intent to divert attention from their participation in seemingly illegal and unlawful behavior that Ms. Lynne professionally and methodically reveals in the course of her work as an investigative journalist.

- (u) Stacy Lynne's reputation and character continue to be damaged by the defamatory statements that have been made repeatedly in public by Sheriff Justin Smith, Judge Julie Kunce Field, and District Attorney Larry Abrahamson.
- (v) Fort Collins Police Services failed to take reasonable care to investigate Ms. Lynne's reports of alleged criminal behavior by Sheriff Justin Smith, Judge Julie Kunce Field, and District Attorney Larry Abrahamson. That failure resulted in ongoing damage to Stacy Lynne's character and reputation and causes daily interference with Stacy Lynne's ability to generate income.
- (w) Stacy Lynne has been and is being targeted, harassed and defamed through collusion of the Larimer County Sheriff's Office, the Eighth Judicial District, the City of Fort Collins, Fort Collins Police Services, as well as others in the County of Larimer, due to her reputation of helping citizens and small business owners understand their rights and prevent the violation of their rights.
- (x) *The totality of the circumstances surrounding this Notice of Claim constitutes widespread and continuing harassment, intimidation and defamation against Stacy Lynne by public servants and government actors who are employed in Larimer County.*

### **3. Name and Address of Public Entities Involved**

#### **Larimer County Sheriff's Office**

2501 Midpoint Drive  
Fort Collins, Colorado 80525

Sheriff Justin Smith  
Sergeant John Feyen  
Sergeant Jeffrey Van Hook  
Corporal Ryan Berg  
And Others

#### **Fort Collins Police Services**

2221 South Timberline Road  
Fort Collins, Colorado 80525

Police Chief John Hutto  
Captain James Szakmeister  
Officer David Hart  
Officer Wendy Slaughter  
And Others

#### **City of Fort Collins**

City Hall West  
300 Laporte Avenue  
Fort Collins, Colorado 80522

City Manager Darin Atteberry  
Former Mayor Karen Weitkunat  
And Others

#### **Eighth Judicial District**

Larimer County Justice Center  
201 Laporte Avenue  
Fort Collins, Colorado 80521

Cliff Reidel, District Attorney  
Larry Abrahamson, District Attorney  
Julie Kunce Field, Judge  
Stephen J. Schapanski, Chief Judge  
Janelle Brunin, Judicial Administrator  
And Others

#### **4. Concise Statement of the Nature and Extent of the Injury Claimed**

The Colorado Governmental Immunity Act provides that public entities are generally entitled to immunity from the tortious actions of their employees except where such immunity is waived either by certain statutory exceptions or by certain conduct performed by the employee. Furthermore, the immunity of public employees is waived if their actions are willful and wanton. C.R.S. 24-10-118(1).

Because of the actions of employees at the Larimer County Sheriff's Office, the Eighth Judicial District, the City of Fort Collins, and Fort Collins Police Services, Stacy Lynne was deprived of her Federal and State civil rights. Sovereign immunity is waived in this action because the civil rights violations and injuries resulted from the willful and wanton actions of those employees.

#### **5. Statement of the Amount of Monetary Damages Requested**

Plaintiff seeks compensation for the civil rights violations and injuries caused by the actions of employees of the Larimer County Sheriff's Office, the City of Fort Collins, the Eighth Judicial District, and Fort Collins Police Services. The estimate of the losses, to date, is nine hundred and ninety thousand dollars (\$990,000.00). Plaintiff is seeking damages for both economic and non-economic loss, including but not limited to: bond payment, loss of liberty, violations of civil rights, emotional distress, intentional infliction of emotional distress, outrageous conduct, malicious abuse of process, and all attorney fees and costs, as allowed by statute.

## CERTIFICATE OF SERVICE

I, Stacy Lynne, hereby certify that on May 1, 2015, I caused the foregoing NOTICE OF CLAIM under the Colorado Governmental Immunity Act to be served upon the parties listed below via civil process service:

Larimer County Sheriff's Office  
2501 Midpoint Drive  
Fort Collins, Colorado 80525

Fort Collins Police Services  
2221 South Timberline Road  
Fort Collins, Colorado 80525

City of Fort Collins  
City Hall West  
300 Laporte Avenue  
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Ralph L. Carr Colorado Judicial Center  
1300 Broadway, Tenth Floor  
Denver, Colorado 80203

Date: May 1, 2015

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Stacy Lynne  
305 West Magnolia Street #282  
Fort Collins, Colorado 80521