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| <input type="checkbox"/> County Court <input type="checkbox"/> District Court Jefferson County, State of Colorado 100 Jefferson County Parkway Golden, CO 80401 | DATE FILED January 11, 2023 10:10 AM FILING ID: A9FC5F15FD8D9 CASE NUMBER: 2022CR3360 |
| PEOPLE OF THE STATE OF COLORADO v. DESIREE GONZALEZ AKA: Defendant | ▲ COURT USE ONLY ▲ |
| Alexis King, District Attorney Allie Galvan, Deputy District Attorney 500 Jefferson County Parkway Golden, CO 80401-6020 Phone Number: (303)271-6800 FAX Number: (303)271-6888 E-mail: Attorney Reg. 55007 | Case No. D0302022CR003360 Div: 7 Ctrm: |
| MOTION TO ADD COUNTS 4-14 | |

ALEXIS KING, District Attorney in and for the First Judicial District, County of Jefferson, State of Colorado, respectfully requests this Honorable Court add count(s) to the above-entitled action, to-wit:

Count 4: VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Barbara Franks, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S..

Count 5: VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Richard Oliver, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 6: VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Wendi Strom, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 7 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S.
(M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Mary Janssen, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 8 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S.
(M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Adam Paul, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 9 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S.
(M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Charles Abel, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 10 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S.
(M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Jeslin Shahrezaei, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 11 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Sharon Vincent, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 12 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Sophia Mayott-Guerrero, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 13 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Anita Springsteen, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

Count 14 : VIOLATION OF A PROTECTION ORDER - Section 18-6-803.5(1)(a), C.R.S. (M1) [1806E]

On 01/05/2023, Desiree Gonzalez, who had been personally served with a protection order issued pursuant to section 18-1-1001, C.R.S. or had otherwise acquired from the court or law enforcement personnel actual knowledge of the contents of such a protection order, unlawfully and knowingly violated any provision of a protection order designed to protect Rebekah Stewart, the protected person, from imminent danger to life or health, a type of conduct prohibited by the protection order; in violation of section 18-6-803.5(1)(a), C.R.S.

All offenses committed, or triable, in the county of Jefferson and against the peace and dignity of the People of the State of Colorado.

Respectfully submitted,

ALEXIS KING
District Attorney

By: /s/ Allie Galvan
Allie Galvan
Deputy District Attorney
Registration No. 55007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION TO ADD COUNTS 4-14 was served on January 11, 2023 via

☐ First Class U.S. Mail, postage pre-paid

☒ Colorado Courts E-Filing

☐ Inter-Office Mail

☐ Hand Delivery

Properly addressed to the following:

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/s/ AG

*Original signatures on file at Jefferson County District Attorney's Office.