

COUNTY COURT  
SAN JUAN COUNTY, COLORADO  
P.O. Box 900, Silverton, Colorado 81433  
(970) 387-5790

DATE FILED: May 3, 2022 3:58 PM

**PEOPLE OF THE STATE OF COLORADO**

v.

**KEITH LESLIE HARPER,**  
Defendant.

Christian Champagne, DISTRICT ATTORNEY  
BY: David K. Ottman, Assistant District Attorney  
1060 Main Avenue, Durango, CO 81301  
Phone: (970) 247-8850; Fax: (970) 259-0200  
Email: OttmanDK@co.laplata.co.us  
Atty. Reg. No. 33329

COURT USE ONLY

**Case Number: 11 M 16**

Div.: A Ctrm.:

**PEOPLE'S OBJECTION TO DEFENDANT'S PETITION TO DISCONTINUE SEX  
OFFENDER REGISTRATION**

THE PEOPLE OF THE STATE OF COLORADO, by and through Assistant District Attorney David K. Ottman, file its Objection to Defendant's Petition to Discontinue Sex Offender Registration, and in support thereof, state as follows:

1. On March 13, 2012, Defendant was sentenced to probation on conviction for two counts of Unlawful Sexual Contact, C.R.S. § 18-3-404(1)(a), a class 1 misdemeanor.
2. On April 3, 2012, Defendant appealed his conviction in San Juan District Court case no. 2013CV4. On April 4, 2013 the District Court upheld Defendant's conviction. On December 9, 2013, the Colorado Supreme Court issued an order denying Defendant's Petition for Writ of Certiorari.
3. On November 12, 2014, Defendant's probation sentence was converted to a fifteen month jail sentence. Sentence Modification Order dated Nov. 12, 2014 (Peo. Ex. 1). That sentence was subsequently modified pursuant to a Crim. P. 35(b) request to 12 months. Sentence Order dated Nov. 18, 2014 (Peo. Ex. 2). Defendant was released from jail on or before December 1, 2015.
4. On March 15, 2022, Defendant filed a Petition to Discontinue Sex Offender Registration pursuant to C.R.S. § 16-22-113(1)(b). The People have until May 17, 2022 to object. C.R.S. § 16-22-113(2)(d).

5. Pursuant to C.R.S. § 16-22-113(1)(b), a person who has been convicted of “class 1 misdemeanor . . . unlawful sexual contact,” may petition to deregister, “*after a period of ten years* from the date of such person's discharge from the department of corrections, if such person was sentenced to incarceration . . . or final release from the jurisdiction of the court for such offense.” (emphasis added).
6. Because this Court’s jurisdiction concluded, at the earliest, in November 2015, he cannot yet petition this Court to deregister until no earlier than November 2025.

WHEREFORE, the People request that this Court deny the Defendant’s Petition to Discontinue Sex Offender Registration, as Defendant is not yet statutorily eligible for deregistration pursuant to C.R.S. § 16-22-113.

DATED this 3<sup>rd</sup> day of May 2022.

Respectfully submitted,

CHRISTIAN CHAMPAGNE  
DISTRICT ATTORNEY

/s/ David K. Ottman  
David K. Ottman, Atty. Reg. No. 33329  
Assistant District Attorney

Certificate of Service

I hereby certify that a copy of the foregoing pleading was sent via U.S. Mail, addressed to Keith Leslie Harper, P.O. Box 1, Mountain Center, CA, 92561 on this 3<sup>rd</sup> day of May, 2022.

/s/ David K. Ottman  
Signature