Attachment A

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Sharon Eubanks, Staff Attorney
Legislative Legal Services
Colorado State Capital
200 East Colfax Avenue
Denver, CO 80203

Re: Laura Bradford

Dear Ms. Eubanks:

We represent Representative Laura Bradford in all matters arising from a traffic ticket she received in Denver, Colorado on or about January 25, 2012. Please pass this letter along to the ethics committee convened by Frank McNulty, Speaker of the House.

Ms. Bradford has referred questions for which Ms. Bradford is to provide an explanation of her understanding of the issues raised in the complaint in order to assist the Speaker, the majority leader and the minority leader in making a preliminary determination of whether or not the complaint appears to be meritorious.

We must first address the erroneous statements contained in the "specific allegations" paragraph of Mr. McNulty's letter dated January 31, 2012 to the Honorable Amy Stephens and Mark Ferrandino. Although there may have been suspicion, there is no factual allegation that Laura Bradford committed the offense of "driving under the influence of alcohol or while her abilities were impaired." Additionally, there is no conclusive proof of such an allegation, were it to be made. Furthermore, when stopped by Denver Police Officers, she was not "availed" of the legislative privilege. Denver Police Officers made a decision. They chose to issue a traffic citation to Ms. Bradford. The Denver Police Department publicly established the fact that Ms. Bradford neither expressly nor implicitly invoked any legislative privilege against being detained. She was not charged with any alcohol related traffic offense, and at the time of writing this letter, it has just come to our attention that the Denver District Attorney's office has also

determined not to charge Ms. Bradford with unlawful possession of a firearm while under the influence of alcohol.
The response to the specific issues for review are as follows:

1) A. No. Representative Bradford was not driving under the influence of alcohol or while her abilities were impaired in violation of C.R.S. § 42-4-1301(a) or (b) (2112).

B. No. Because Ms. Bradford did not drive under the influence of alcohol or while her abilities were impaired, it necessarily follows that Ms. Bradford's conduct did not involve her legislative duties in a manner to warrant action under House Rule 49.

2) A. No. The Denver Police Department has publicly established the fact that Ms. Bradford did not expressly or implicitly invoke the legislative privilege against being detained and she was charged with a traffic violation which is still pending.

B. Because Ms. Bradford did not expressly or implicitly invoke any privilege, it necessarily follows that she did not engage in any misconduct involving her legislative duties in any manner to warrant action under House Rule 49. House Rule 49 appears to be a procedural rather than a substantive rule. The committed does not cite any other Rule as being violated by Ms. Bradford.

It is disturbing that in the very place where the law is supposed to be made, the law is apparently not being respected and applied in the manner in which it was designed.

In the United States of America, it is a fundamental rule of law that every person accused of a crime is innocent unless or until they are proven guilty of that crime beyond a reasonable doubt. Suspicion is not synonymous with guilt. In this case, the presumption of innocence has been denied Ms. Bradford *via* a number of reckless descriptions and media reports which have conveyed a false impression of presumptive guilt, while at the same time incorrectly and improperly portraying her as being just out of reach of justice and society's retribution by virtue of her status as a legislator. Thankfully and commendably, the Denver Police Department quickly clarified and informed the public of the truth of the matter before things became any more ridiculous.

Based upon the foregoing, we assert that the complaint against Ms. Bradford is wholly without merit and should therefore be dismissed.

Very truly yours,

Richard W. Bryans, Jr.

Cc/file
LB