

ARREST WARRANT

THE PEOPLE OF THE STATE OF COLORADO,

TO: ANY PEACE OFFICER IN THE STATE OF COLORADO, INTO WHOSE HANDS THIS WARRANT SHALL COME, GREETINGS:

WHEREAS, Michael Struwe, a peace officer, has made Application and Affidavit for the issuance of an Arrest Warrant; and,

WHEREAS, the Application appears proper, and this Court is satisfied that there is probable cause to believe that the person named in the Application has committed the offenses of:

1. Second degree burglary, F4, in violation of CRS 18-4-203;
2. Cybercrime, M2, in violation of CRS 18-5.5-102(1)(a)

YOU ARE THEREFORE COMMANDED TO ARREST

BELINDA GAIL KNISLEY, DOB: 07/27/1955

WF / 5'6" tall / 175 pounds / BLONDE hair / HAZEL eyes

and bring him/her without unnecessary delay before the nearest available Judge of the County or District Court.

It is therefore ordered that Bond Is set in the amount of \$ No Bond until first appearance.

DONE this date 8/26/21

BY THE COURT



JUDGE

Return of Service

I certify I arrested this person on _____ at _____
Date / Time

_____, _____ County, State of _____
Location County Name State Name

Officer

DISTRICT / COUNTY COURT, MESA COUNTY, STATE OF COLORADO
CASE NUMBER 21CR

Office of the District Attorney, 21st Judicial District

RE: DA's Office: 21-266

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

IN THE MATTER OF:

The People of The State of Colorado

V.

BELINDA GAIL KNISLEY

and in support of the Application for Arrest Warrant, Investigator Michael Struwe presents the following Affidavit in support of Arrest Warrant and asserts the following:


1. That I am of lawful age and a duly sworn law enforcement officer currently employed by the 21st Judicial District of Colorado, Office of the District Attorney and was so at all times relevant to the facts contained herein. All of the information herein contained was compiled by me in the course of a criminal investigation, including reviewing official reports and documents, speaking with fellow law enforcement officers, and interviews with named citizens. All locations referred to are in the County of Mesa, State of Colorado, unless specifically noted otherwise.
2. On 08/23/21, at about 1500 hours, Mesa County Administrator PETER BAIER, along with Mesa County's Director of Human Resources, responded to 200 S Spruce St, the Mesa County Clerk and Recorder's Division of Motor Vehicles (DMV) office. BAIER met with Mesa County Chief Deputy Clerk and Recorder, BELINDA KNISLEY, and served her official, written notice that she was suspended as a Mesa County employee. It should be noted, KNISLEY is employed by the County of Mesa and subject to the employment policies of the County; she is not an elected official. KNISLEY was also verbally advised that she was on administrative suspension.
3. The written notice included an explanation of the grounds for disciplinary action, namely, that the County received numerous complaints from multiple sources that KNISLEY engaged in inappropriate, unprofessional conduct in the workplace.
4. Paragraph four of the notice read, in part:
 - a. You are being suspended with pay pending the outcome of the investigations. Effective immediately you are on administrative leave with pay pending a final decision. During this time you are not to be present at your work site. You are also not to be conducting any work for Mesa County.
5. BAIER ensured that KNISLEY vacated the premises, 200 S Spruce St, which is one of KNISLEY's work sites. BAIER observed KNISLEY hand a set of keys to [REDACTED], and then converse with [REDACTED].
6. On 08/23/21, KNISLEY's access to Mesa County computers, networks, and servers was disabled by Mesa County IT; it is still disabled.

7. On the morning of 08/25/21, an email from Mesa County Clerk and Recorder TINA PETERS' Mesa County email was sent to Mesa County IT requesting assistance with authorization to print. It should be noted that print requests within the Mesa County DMV work space require a unique user "print pin," or the user may swipe their access badge to authorize and log the print job. Based on the request from PETERS' email, a Mesa County IT employee responded in person to PETERS' office at the DMV. PETERS was not located within her office, so Mesa County IT responded via email, requesting PETERS notify IT when she was in her office, so IT could come assist. Another email was received from PETERS' email account requesting the print pin be sent over email. IT replied that they were not allowed, per policy, to send passwords over email. IT also advised that a print job could be authorized by a badge swipe at the printer in the office. It should be noted that although KNISLEY is on administrative suspension, PETERS is an elected official and as such, PETERS was still allowed access to Mesa County systems via her credentials.
8. On 08/25/21, at about 1200 hours, BAIER received information that KNISLEY was inside a secured (not open to the public) work area at the Mesa County DMV, 200 S Spruce St, the same work site KNISELY had been escorted off of on 08/23/21. BAIER, along with Mesa County's Director of Human Services, responded to 200 S Spruce St and upon entering the secured work area, found KNISLEY at [REDACTED] work station, along with [REDACTED]. BAIER heard KNISLEY instructing [REDACTED] to "print" something off of [REDACTED] Mesa County work computer. [REDACTED] was advised by Mesa County's HR Director not to print anything. BAIER advised KNISELY that he needed to speak with her and asked if there was somewhere they could go. KNISLEY agreed and led BAIER toward her former office within the work site, but then ultimately walked into PETERS' office instead of her own.
9. Inside of PETERS' office, BAIER observed computer monitors displaying a Gmail application (Mesa County email is contracted through Google Gmail). PETERS was not in her office. BAIER advised KNISLEY that she needed to vacate the premises or the local police would be called. KNISLEY requested to call her attorney and BAIER allowed her to. KNISLEY called a female who identified herself as KNISLEY's attorney and she began asking BAIER questions. BAIER directed KNISLEY's attorney to the proper entity for her questions, the Mesa County Attorney, and advised her KNISELY was suspended and needed to leave the property. Ultimately, KNISLEY's attorney advised KNISLEY to leave. BAIER observed KNISELY again handing [REDACTED] a set of keys before she was escorted off of the property.
10. On 08/25/21, at about 1700 hours, in response to a search warrant obtained by the 21st Judicial District Attorney's Office, Mesa County HR prepared to collect PETERS' Mesa County work notebook computer from her office. The notebook was collected from PETERS' office and secured by HR to be transferred to DA Investigator CANNON. The computer was connected to PETERS' work station, including monitors, when it was collected. Based on this, it appeared KNISLEY was using PETERS' Mesa County work station to access the secure Mesa County computer network while she was in PETERS' office earlier on 08/25/21.
11. Mesa County IT pulled the log files on the notebook computer collected from PETERS' office and confirmed that PETERS' Mesa County credentials were used to login to the Windows operating system on the morning of 08/25/21. This login mirrors the user's email access login, so as long as a user logs into Windows under their Mesa County user, they will be automatically verified on their Mesa County email. If verification of their email credentials is requested, it is identical to the Windows login. Mesa County computers require two-factor authentication to login and Mesa County IT confirmed that PETERS' "yubikey" was used to login at that same time. A "yubikey" is a physical dongle that is plugged into a computer that is assigned to a unique user

to validate their credentials. This two-factor authentication necessitates the user have their unique name and password, as well as their unique, physical "yubikey," in order to login. It should be noted that KNISLEY's "yubikey" was seized from her on 08/23/21.

- 12. Upon further investigation, Mesa County IT discovered that during the 08/25/21 session logged into under PETERS' credentials, items were sent to the print server, but were not ultimately printed. What those items were was not immediately clear and remains under investigation. Mesa County IT Operations Manager, LHANA JORDAN, advised it appeared to her that the items sent to the print server ultimately were not printed due to an absence of a "print pin" or badge access authorization.
- 13. As of this writing, there is no known information that PETERS has returned to her office in Mesa County since her departure on or about 08/09/21.
- 14. Per Colorado CRS 18-5.5-102(1)(a), a person commits cybercrime if the person knowingly accesses a computer, computer network, or computer system or any part thereof without authorization; exceeds authorized access...or uses a computer, computer network, or computer system or any part thereof without authorization or in excess of authorized access.
- 15. Per Colorado CRS 18-4-203, a person commits second degree burglary if the person knowingly...enters unlawfully in...a building or occupied structure with intent to commit a crime against another person or property.
- 16. Based on the aforementioned, I believe probable cause exists that on or about 08/25/21, in the County of Mesa and the State of Colorado, BELINDA KNISLEY committed the offenses of:
 - a. Second degree burglary, F4, in violation of CRS 18-4-203;
 - b. Cybercrime, M2, in violation of CRS 18-5.5-102(1)(a)

Therefore a warrant should be issued for the arrest of BELINDA GAIL KNISLEY (07/27/55).


 Investigator Michael Struwe
 Office of the District Attorney
 21st Judicial District
 125 North Spruce Street
 Grand Junction, CO 81502

STATE OF COLORADO)
) SS
 COUNTY OF MESA)

This affidavit was subscribed and sworn before me this 26th day of Aug., 2021, by Investigator Michael Struwe.

BY THE COURT

 Judge