



# THE TICKTIN LAW GROUP

"The lawyers you want between you and your problems"

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December 6, 2025,

President Donald J. Trump  
c/o The Office of the Pardon Attorney  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530  
Email: [USPardon.Attorney@usdoj.gov](mailto:USPardon.Attorney@usdoj.gov)

**Re: Supplement to Application for Presidential Pardon  
For Tina Peters (No Application Number Has Been Assigned, Yet)**

Dear Mr. President:

I know you are aware that Tina Peters is a 70-year-old gold star mother, and that her trial was a travesty, where she was not permitted to raise her defenses. I could go on as to her character, but I prefer to take this opportunity to explain why Tina Peters is a critical, and necessary witness to the most serious crime perpetrated against the United States in history. They stole our whole country for 4 years.

Dominion, and its employees, operated an illegal operation on our soil which was supported and controlled by foreign actors. The Colorado Secretary of State, Jena Griswold, aided and abetted Dominion and foreign countries in targeting Mesa County Clerk, Tina Peters.

First, Dominion directed Ms. Griswold to assist in deleting all data from Dominion brand election equipment by ordering a statewide "Trusted Build." Secondly, Dominion demanded "criminal charges" be brought against Clerk Peters when it discovered that she had the only copy of the 2020 election conducted on Dominion brand equipment. Clerk Peters copy of data was lawful and she was entitled to image and preserve the 2020 election data pursuant to the contract Dominion signed with her as the Clerk of Mesa County. Moreover, Clerk Peters was required to preserve the evidence of the election for 22 months pursuant to federal law 52 U.S.C. § 20701.

Clerk Peters' lone copy of the Colorado 2020 Election is essential. Moreover, as is explained below, regarding current investigations, Clerk Peters is a necessary and material witness. She can testify as to chain of custody, corroborate recent responses to search warrants, etc.

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## **The Bigger Picture of Venezuela's (China's) 20-year Plot to Overthrow the United States**

On December 2, 2025, the United States Government released the public version of Hugo Carvajal Barrios' proffer. The proffer disclosed the ongoing national security investigation that includes Venezuela, Smartmatic, and Dominion. Mr. Carvajal served as Venezuela's Director of Military Intelligence and as a Deputy in the National Assembly. Carvajal stated: "the Smartmatic system can be altered this is a fact. The technology was later exported abroad, including to the United States." Carvajal was referring to the Dominion brand equipment, and the Dominion company.

In 2006, numerous Venezuelans working for Smartmatic were deployed to the United States, given VISAs and began modifying the Sequoia brand election equipment in Chicago, Illinois. A faction of the United States government knew that one of the Venezuelans, Ronald Morales, and other Venezuelans were requesting VISAs for the purpose of accessing the United States election equipment. The United States officials responsible for granting the VISAs intentionally ignored the serious national security risk, and allowed the Venezuelans, and the Venezuelan government to access the United States' critical infrastructure.

In 2020, Ronald Morales worked for Dominion under the direct supervision of Eric Coomer, David Moreno, and John Poulos. Unbeknownst to Colorado's county clerks, including Clerk Peters, Mr. Morales, Mr. Coomer, and Mr. Moreno were the three main people working on our soil to overthrow our government in 2020.

Morales, Coomer, and Moreno's participation included orchestrating access to county servers, implemented VPNs to allow remote access to modify ballot images and data prior to being recorded in volatile memory, implemented programming to allow remote entry, and deletion of remote entry on the election equipment, executed modifications after EAC certification that were not disclosed to the EAC, executed modifications after logic and accuracy testing that were never disclosed to county clerks, implemented and deployed versions



and equipment not consistent with contracts and agreements, altered and deleted data including tally data prior to certification of elections, implemented and concealed foreign access to election equipment prior to certification, mislabeled Dominion brand products to conceal foreign actors, lied to United States government officials about foreign parts and involvement to prevent exposure and oversight, lied to the United States government and failed to disclose that Dominion files were breached on SolarWinds Serv-U, to the United States government after receiving the NSA warning to patch a Microsoft vulnerability, and made changes to the functioning of the adjudication software until the end of October 2020 past certification and logic and accuracy testing.

### **Mesa County Clerk Peters and the Lone Copy of the 2020 Data**

In 2021, Dominion, in an effort to cover its tracks, demanded that Jena Griswold install a "Trusted Build" to take place on all Colorado Dominion brand equipment. Dominion used the Colorado Secretary of State to coordinate the swift plan which was to delete all evidence of the 2020 election. All clerks were notified that they must schedule and allow the Secretary of State's employees to install Dominion's "Trusted Build."

Clerk Peters was lied to by both Dominion and Ms. Griswold's office and told that the "Trusted Build" would not wipe and overwrite the 2020 election data. However, Clerk Peters did not believe the lie, and she took action to image the Dominion brand equipment and preserve the data prior to the "Trusted Build" being installed, in an abundance of caution.

After the Trusted Build was installed, Clerk Peters conducted a subsequent preservation of data, and she learned that it had, in fact, wiped and overwritten 29,000 files of the election records which were required to have been preserved by federal law. In fact, the records of the adjudication, access log, and audit log files were completely and irreparably deleted.

On August 4, 2021, it became publicly known that Clerk Peters had preserved a bit for bit copy of the Mesa County 2020 election conducted on Dominion brand election equipment when the copy was displayed for the nation

at an election integrity event. All passwords had been redacted or changed and there was no legitimate compromise to Mesa County's election security.

Upon learning of the lone copy, Dominion immediately contacted Jena Griswold in her capacity of Secretary of State that Clerk Peters be criminally charged with obtaining a copy of the 2020 election data prior to the installation of the "Trusted Build." The Colorado Secretary of State promptly contacted Mesa investigator, Detective Cannon, who commenced a criminal investigation to charge Clerk Peters despite knowing that her imaging the data was not a crime.

**The Show Trial of Clerk Peters Intended  
To Place All Clerks in Fear of Preserving  
Data Required by Federal Law, Or They,  
Too, Could Be Imprisoned for Life**

At trial, Detective Cannon, who headed the noncriminal-criminal investigation, conceded that he knew that it was not a crime for Clerk Peters to have imaged and copied the data. Yet, he continued to investigate, anyway, despite not having a crime on which to base his investigation.

Detective Cannon testified that he learned that Clerk Peters did not disclose the identity of Conan Hayes, the expert retained by Clerk Peters, to properly preserve the data. Clerk Peters initially requested the IT department to preserve the data but learned that the IT people did not know how to copy it.

Jesse Romero, who worked for the Secretary of State, testified that the Colorado Secretary of State requested that Clerk Peters provide the identity of those that would be present for the "Trusted Build" in the Mesa County office considering "Covid Policy." At that time, it was admitted in open court that there was no law that Clerk Peters violated when she declined to share the expert's identity, because it was merely "a Covid Policy."

The errors at trial were voluminous. Clerk Peters did not work for the Secretary of State, and there was no legal obligation to disclose who entered the Mesa County Clerk's Office to the Secretary of State. Afterall, it was Clerk Peters



who was duly elected by Mesa County. The Court failed to give an execution of public duty jury instruction that would have clearly demonstrated Clerk Peters' power in Mesa County and obligations pursuant to federal law.

Additionally, the Court allowed the state attorney general to mock Conan Hayes, Clerk Peters' expert who imaged the machines, as a "surfer" and "conspiracy theorist" while preventing Clerk Peters from showing that Mr. Hayes' was on federal contract to Homeland Security for the purpose of imaging and copying election data at the time he imaged Mesa County, and that he held top tier security clearances. The Court further erred by refusing to allow sworn testimony that demonstrated that Mr. Hayes had worked as a federal informant to collapse an international criminal organization, BackPage.com, that was cartel run. Clerk Peters was left with no defense demonstrating that she had legitimate reasons to keep Hayes' identity confidential.

The Court was determined to sentence Clerk Peters to life in advance of the November 2024 election to ensure that no clerk had the courage to preserve election data or question the very fraud that was expected by all to take place.

In fact, the Court refused to hear a motion for new trial that was based upon learning that Clerk Peters did not have an unbiased jury of her peers. Following the trial, a former FBI agent interviewed the jurors and learned that one juror believed that Clerk Peters was responsible for targeting her business and cut phone wires costing her thousands of dollars. The juror conceded that she later, after the guilty verdict, learned from police that Peters had nothing to do with the phone wires, but it was too late to fix the prejudice that took place.

**United States Department of Justice,  
Department of War and Homeland  
Security Accountability Underway Now**

The dominos started falling on August 9, 2024, when the United States Department of Justice unsealed indictments including Money Laundering and Violations of the Foreign Corrupt Practices Act against Juan Andres Donato Bautista, Roger Alejandro Pinate Martinez, Jorge Miguel Vasquez, and Elie



Moreno. That indictment coyly concealed the identity of Smartmatic.

The second domino fell on October 16, 2025, when the United States Department of Justice unsealed a Superseding Indictment charging SGO Corporation Limited, a/k/a "Smartmatic" with Conspiracy to Violate the Foreign Corrupt Practices Act, Conspiracy to Engage in Money Laundering, and Money Laundering.

The third domino fell on December 2, 2025, when Carvajal's public version proffer was made available, announcing the criminal investigation including to United States election companies.

Clerk Peters is a critical eye witness to the destruction of federal election records by Jena Griswold. She is also necessary to establish chain of custody of the forensic images. Her testimony corroborates all of the data obtained by search warrants and consent through cooperating government offices. Inevitably, Dominion will blame "human error at the local level" as it did in an action in Antrim County or "isolated erroneous source code" as it did in Williamson, Tennessee, but when all of the data has the same common, criminal evidence, it demonstrates the orchestrated criminal plan and enterprise. Now it is obvious why Clerk Peters had to be silenced.

### **Present Prison Situation**

At this point, Tina Peters has served 431 days in prison.

Of course, prison is a horrible experience for anyone, but it is worse for those who are innocent and wrongfully persecuted. It is even worse for those who are categorized as evildoers or political prisoners with whom the guards and the general prison population disagree.

Moreover, in Colorado, the prison system for women does not separate those convicted for the white-collar crimes *vis a vis* the violent offenders. There are dangerous people who truly belong locked up, but Tina Peters is not one of them.

About 6 months ago, Mrs. Peters was threatened with harm. Her life was

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threatened by a group of inmates, to stab her and to kill her. This was reported to the FBI and DOJ, which had agents interview her. She was moved to a different unit.

In the new unit, she was attacked by other prisoners 3 times in different locations where guards had to pull inmates off of her.

There is actually a safe unit where inmates who do not cause problems can be assigned. She has applied to be put into that unit but was denied 6 times without a valid reason.

Presently, she is in the smallest cell of her unit. It was formerly used for a washing machine and drier. She and her cellmate have just 21 square feet, or 3 feet by 7 feet. Only 1 of the 2 cellmates can stand at a time.

Lately, she has been required to take drug tests in the evening, when she otherwise would have been sleeping. That process takes hours during which she mostly was required to sit on cold cement.

This was while enduring a chronic cough which was similar to the cough she had before surgery for lung cancer where a third of one of her lungs was removed in 2016. Yet, all she was given was an X-ray. Moreover, she has 3 places in her spine which are degenerative, and the prison refuses to provide a mattress more than 2 inches thick even though the prison possesses 40 mattresses which are 4 inches thick and stored and not used.

The area also has black mold to which she is exposed.

**You Have the Power to Pardon  
Tina Peters For Offenses of The  
State of Colorado**

You, as the President of the United States, have the power to grant a pardon pursuant to Article II, Section 2, Paragraph 1 of the Constitution of the United States, which states in part: ". . . he shall have Power to grant Reprieves and Pardons for Offenses against the United States, except in Cases of Impeachment."

The reason that many pundits opine that you have only the power to grant pardons for federal offenses is that we all understand the "United States" to be



the federal government of our country. We have one country, and it is called the "United States." When we consider the United States, it's personal pronoun is "it" which exemplifies that it is one nation. Therefore, we read "Offenses against the United States" to mean offenses against the federal government.

However, from the time of its inception until after the Civil War, when one considered the "United States," it was thought of as the various countries or states which had become united. Hence, when its pronoun was used, it was always "they," "them," or "their." For instance, Article III, Section 3, Paragraph 3, of the Constitution states: "Treason of the United States, shall consist only in levying War against **them**, or in adhering to **their** Enemies, giving them Aid and Comfort. . ." (Emphasis added.)

The understanding of these united countries was that our country was a conglomerate of separate countries which had been united for certain common purposes and protections. That understanding is evidenced toward the end of the Civil War in the 13th Amendment. It states: "Section 1. Neither slavery nor involuntary servitude. . . shall exist in the United States, or any place subject to **their** jurisdiction. (Emphasis added.)

The question of whether a president can pardon for state offenses has never been raised in any court. The issue which needs to be answered whether our founders understood or intended when they wrote that the President had the Power to Pardon offenses against the United States, if it meant the states or only the federal government. Did they mean the one central authority, or did they mean the plural, meaning the states which were united? In that day and age, they were speaking of the United Countries, and the President was given the right to pardon all offenses.

Moreover, it does not make sense that they intended to give the individual states the power to circumvent the President's power to pardon. The matter of Tina Peters is a perfect example of how the power of the President is being circumvented.

Tina Peters committed no crime. What she did was obey the federal requirement to preserve the evidence of the election. She followed federal law. By charging Mrs. Peters with collateral state offenses, the State of Colorado believes that it can operate in the shadows of the President, where the light of his authority does not extend. This could not have been what the founders envisioned. The President of the United States has the power to grant a pardon



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in any of the states of the United States.

For more information, the Whistle Blowers' declaration, videos, and other pertinent information can be found at [TinaPeters.us](https://TinaPeters.us).

Respectfully submitted,



Peter Ticktin

PT:ms

cc: Ed Martin  
Kurt Olsen