

Below is a *condensed* student-written office memorandum that demonstrates how citations will look in a document. Because underlining is an acceptable way to denote italics, and some law professors require students to underline citations, that typeface has been used throughout this memo. Italics would also be acceptable.

MEMORANDUM

TO: Kelly Foster
FROM: Jeffrey P. Rosato
DATE: October 25, 1999
RE: Julia Bergan: Analysis of Credible Threat Element of the Colorado Harassment by Stalking Statute (our file 99/1278)

Issue

Under the Colorado harassment by stalking statute, did Patrick Bergan make a credible threat with the intent to annoy, harass, or alarm his estranged wife, Julia Bergan, when she received faxes originating from his place of business that contained statements such as "Do you think anyone would notice if you disappeared?"

Brief Answer

Yes. Patrick Bergan did make a credible threat against Julia Bergan. Mrs. Bergan received a fax that originated from her ex-husband's workplace; it was signed with the initial "P," the same as Mr. Bergan's first initial; and the fax alluded to her possible disappearance. This fax, combined with the fact that others spotted his car outside her new residence, would be sufficient to meet the "credible threat" prong of the Colorado harassment statute.

Facts

Our client, Julia Bergan, has accused her estranged husband, Patrick Bergan, of stalking her. On August 24, 1999, Julia and Patrick Bergan were legally separated pending a

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Daniela Niemeyer



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