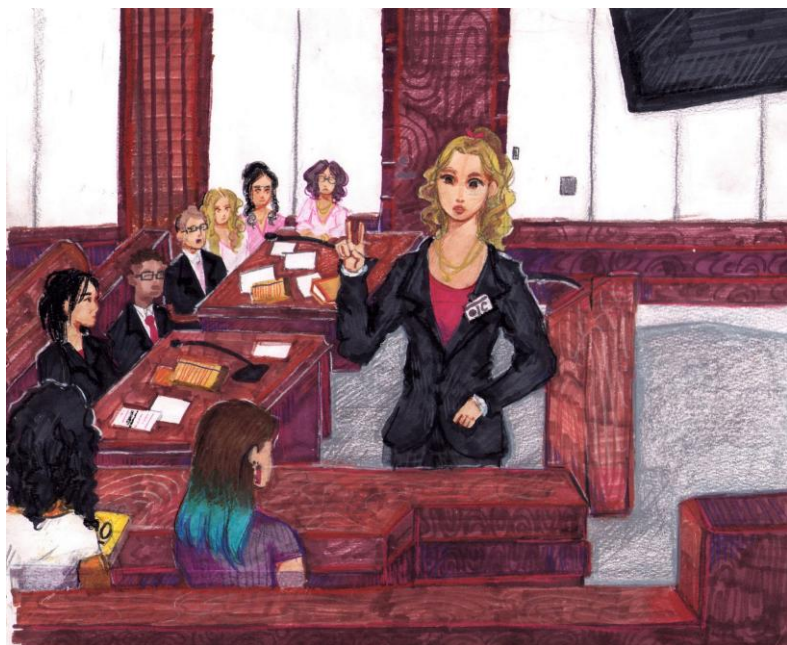


2026 NEW MEXICO HIGH SCHOOL MOCK TRIAL CASE

STATE OF NEW MEXICO

VS.

BOBBIE GURULE



Artwork by Sydney Zellers



CENTER FOR CIVIC VALUES

PROVIDING EDUCATION AND RESOURCES
FOR PUBLIC PARTICIPATION IN THE LAW

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Questions and Contact Information

Questions concerning these case materials should be emailed to Kristen Leeds at the Center for Civic Values.

You may begin submitting questions anytime. **The deadline for submitting questions is noon on February 1, 2026.** The final update will be posted no later than **February 9, 2026.**

Questions must be sent in writing using mocktrial@civicvalues.org. Please be sure to include return contact information in the event we need to reach you to clarify a question.

Answers to questions will be posted on the mock trial website: <https://civicvalues.org/mock-trial/this-years-case/clarifications/>.

Please check the [website](#) to see if your question has been answered before sending an email.

Introduction and Acknowledgments

Welcome to the 2026 New Mexico High School Mock Trial Competition. Mock Trial, which began in 1978 and is administered by the Center for Civic Values (CCV), is an academic activity set in a competitive environment. It gives students hands-on experience in the law as it helps them develop the skills necessary for the mastery of state content standards for language arts and social studies.

The cover page features artwork by Sydney Zellers, a student from V. Sue Cleveland High School who competed in the 2025 mock trial competition.

This year's case, *State of New Mexico vs. Bobbie Gurule*, is a criminal proceeding in which the State has charged the defendant with two counts of robbery, one as a second-degree felony and the other (being a second and subsequent offense) as a first-degree felony.

The original case was written by the Oregon Classroom Law Project Mock Trial Committee and adapted for Utah by Utah Law Related Education. The New Mexico case adaptation was done by CCV Executive Director Kristen Leeds and board members Jack Sullivan, Heather Jaramillo, and Jessie Lundschen. The CCV Board and staff thank the hundreds of volunteers who annually contribute their time and energy to the organization and running of the program, including the teachers who sponsor and coach teams, the attorneys who coach those teams, the judges who preside over and score the trials, and the administrative volunteers who provide invaluable assistance in the actual hosting of the qualifier and final competitions.

In addition, CCV expresses its heartfelt gratitude to Chief Judge Joshua J. Sanchez, Bernalillo Metropolitan Court in Albuquerque, Chief Judge Marie Ward, Second Judicial District Court, and Chief Judge the Honorable Kenneth J. Gonzales, U.S. District Court for the District of New Mexico for their support of mock trial. We also express our gratitude to Camille Baca, Bernalillo County Metropolitan Court, Mark Macaron, 2nd Judicial District Court, Alonzo Medina, U.S. District Court, and all the esteemed judges and the dedicated staff of all three courts for their support of our mock trial program.

We also extend special thanks to the New Mexico Legislature for the annual funding provided to the mock trial program and the University of New Mexico School of Law for acting as the fiscal

agent. We hope you find these materials interesting and wish you all the best of luck!

Case Summary

On Monday, August 11, 2025, the quiet town of Lincoln experienced a first. On that day, as the bank employees of the Lincoln branch of the Conchas Savings Bank opened for business, a person dressed in a black mask, hoodie, black gloves, jeans, and white sneakers entered the facility, pointed a silver handgun at the bank manager and gave instructions via a note: “Put Everything Behind the Counter in the Bag.” When all was said and done, the masked person fled the scene with roughly \$3,000. For the first time that anyone could remember, a Lincoln bank had been robbed. Local authorities were stumped and had little to go on other than eyewitness descriptions. The bank’s security cameras were not operational that morning due to a scheduled service upgrade. It seemed that this robbery may remain an open case.

Two days later, on Wednesday, August 13, 2025, a similar event took place not too far from Lincoln. This time, the Stash Junction branch of the Conchas Savings Bank was the target. As with the robbery two days earlier, a person in a black mask, hoodie, black gloves, jeans, and white sneakers entered the facility early in the day, pointed a silver handgun at those inside and handed a teller a note instructing them to put everything behind the counter into a paper bag. This time the robber escaped with just over \$5,000. Once again, the cameras, due to service upgrades, were inoperable and no footage of the event was captured. When local police officers and detectives arrived, it seemed that they were, once again, without much to go on for their investigation, yet this time something was different. A teller at the Stash Junction branch had placed a GPS tracking device into the robber’s bag amongst the stolen cash. The authorities tracked that GPS signal all the way to an off ramp just off old highway 91 and near Cibola Casino.

On Thursday, August 14, 2025, Bobbie Gurule walked into the Lincoln branch of the Conchas Savings Bank and handed over a check for \$5,212.14 to make Bobbie current on Bobbie’s mortgage payment. Since being fired from Bobbie’s former employer, Downey Security, back in January 2025, Bobbie had been having a difficult time paying the monthly mortgage, missing payments from March to July.

Bobbie’s payment came at just the right time, as the bank was set to foreclose on Bobbie’s house that week. The check, made out to the bank for the exact amount due, was issued by Cibola

Casino the day prior, August 13, 2025.

After Bobbie's visit to the bank, the branch manager, Harper Van Zant, called Detective Rector to report on the interaction with Bobbie and some uneasy feelings about the entire situation. Bobbie had mentioned that a lucky night in the casino was the origin of the sudden cash windfall, and Harper began to draw connections between Bobbie and Monday's robbery, including Bobbie's involvement in scheduling the bank's security camera upgrades when still working for Downey Security. After a brief investigation by Detective Rector, Bobbie Gurule was arrested and indicted on two charges of robbery, one for the August 11 robbery of the Lincoln branch of Conchas Savings Bank as a second degree felony and the second for the August 13 robbery of the Stash Junction branch of the Conchas Savings Bank as a first degree felony on account of it being a second and subsequent offense.

The witnesses for the State are:

- *Riley Rector*, detective;
- *Harper Van Zant*, bank manager;
- *Taylor Lightman*, computer forensics specialist.

The witnesses for the defense are:

- *Bobbie Gurule*, defendant;
- *Dakota Prescott*, assistant floor manager, Cibola Casino;
- *Drew Armenta*, private investigator.

Pleadings

**STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL
DISTRICT**

No. D-1226-CR-2025-00499

**STATE OF NEW MEXICO,
Plaintiff,**

vs.

**BOBBIE GURULE,
Defendant.**

Criminal Information

Dwight Harris, Assistant District Attorney for the Twelfth Judicial District of the State of New Mexico accuses Bobbie Gurule of ROBBERY and charges as follows:

COUNT I: ROBBERY, SECOND DEGREE FELONY

That on or about August 11, 2025, in Lincoln County, New Mexico, the above-named defendant, while armed with a handgun, a deadly weapon or an instrument or object which, when used as a weapon, could cause death or very serious injury, did unlawfully use or threaten to use the dangerous weapon, and unlawfully and intentionally took property in the immediate control of a person, against the person's will, by means of force or violence, and with a purpose or intent to deprive the individual permanently of the personal property, a second degree felony in violation of NMSA 1978, Section 30-16-2.

COUNT II: ROBBERY, FIRST DEGREE FELONY

That on or about August 13, 2025, in Lincoln County, New Mexico, the above-named defendant, while armed with a handgun, a deadly weapon or an instrument or object which, when used as a weapon, could cause death or very serious injury, and unlawfully and intentionally took property in the immediate control of a person, against the person's will, by means of force or violence, and with a purpose or intent to deprive the individual permanently of the personal property, a second and subsequent robbery offense and first degree felony in violation of NMSA 1978, Section 30-16-2.

Date: November 1, 2025

/s/ Dwight Harris
(Signature of the complainant)

**STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL DISTRICT**

No. D-1226-CR-2025-00499

**STATE OF NEW MEXICO,
Plaintiff,**

vs.

**BOBBIE GURULE,
Defendant.**

Order On Preliminary Examination

Per the Criminal Information, the two charges of ROBBERY in violation of NMSA 1978, Section 30-16-2 appeared before me.

A preliminary examination on the offenses set forth in the Criminal Information having been waived, IT IS HEREBY ORDERED pursuant to Rule 5-302(D)(2) NMRA that Defendant Bobbie Gurule is BOUND OVER FOR TRIAL in the District Court on the charges contained in the Criminal Information.

IT IS SO ORDERED

Date: November 9, 2025

/s/ Matea Santiago
District Judge

**STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL DISTRICT**

No. D-1226-CR-2025-00499

**STATE OF NEW MEXICO,
Plaintiff,**

vs.

**BOBBIE GURULE,
Defendant.**

Arraignment and Plea Proceeding

THIS MATTER having come before the Court on a Criminal Information charging Defendant Bobbie Gurule with two counts of robbery in violation of NMSA 1978, Section 30-16-2; the Court finds as follows:

1. Defendant Bobbie Gurule appeared in person accompanied by their attorney, Sydney Gonzales, and was formally arraigned in open court.
2. Defendant Bobbie Gurule entered a plea of NOT GUILTY to the charges contained in the Criminal Information, which plea has been received by the Court and ordered of record herein.

THEREFORE, IT IS HEREBY ORDERED that Defendant Bobbie Gurule is hereby released on their own recognizance on the following conditions: Defendant shall obey all laws, make all court appearances, stay in contact with their attorney once a week until trial or disposition of this matter, and remain in the jurisdiction of the State of New Mexico.

IT IS SO ORDERED

Date: November 9, 2025

/s/ Matea Santiago
District Judge

**STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL DISTRICT**

No. D-1226-CR-2025-00499

**STATE OF NEW MEXICO,
Plaintiff,**

vs.

**BOBBIE GURULE,
Defendant.**

Stipulations

1. All documents, signatures, and exhibits, including pre-markings, included in the case materials are authentic and accurate in all respects; no objections to the authenticity of the documents will be entertained. The parties reserve the right to dispute any legal or factual conclusions based on these items and to make objections other than to authenticity.
2. Jurisdiction, venue, and chain of custody of the evidence are proper and may not be challenged.
3. All statements were notarized on the day on which they were signed.
4. All evidence was constitutionally recovered and all statements were constitutionally obtained. No objection will be entertained to the constitutionality of any evidence, nor will any motions to suppress on constitutional grounds be permitted.
5. Except as noted elsewhere, objections may be made to any exhibit or testimony pursuant to the Rules of Evidence. However, no objection may be made as to the constitutionality of the admission of any evidence. For example, the defendant may object that some testimony or exhibit is hearsay, but may not object that admission of the testimony or exhibit violates their Sixth Amendment right to confrontation under *Crawford v. Washington*, 541 US 36 (2004) or other constitutional precedent.
6. On both August 11, 2025, and August 13, 2025, each branch of Conchas Savings Bank was in the process of upgrading its security system, which means that none of the events occurring at those branches on those dates were captured on any video or audio recording system.
7. The silver handgun present at both incidents constitutes a “deadly weapon” under New Mexico law.

8. Exhibit 5 accurately depicts data obtained from Bobbie Gurule's Google account concerning the date, time, and physical location of an Android mobile device associated with the account. The account contains no data indicating that the device was in Stash Junction at any time on August 13, 2025.
9. A person's first offense of robbery while armed with a deadly weapon is a second-degree felony. For second and subsequent offenses of robbery while armed with a deadly weapon, a person is guilty of a first-degree felony.
10. The diagram shown in Exhibit 1 is a fair and accurate representation of the Bank GPS Location Map though not to scale.
11. Exhibits 2, 3 and 4 are fair and accurate representations of the Cibola Casino Check, the Car Title and the Lincoln Branch Mortgage Foreclosure Letter.
12. Exhibit 6 is a Cibola Casino transaction log showing player cash-ins and cash-outs on August 11 and August 13, 2025.
13. Exhibit 7 is a true and correct excerpt from the Conchas Savings Bank's Employee Training Manual.
14. Exhibit 8 is a true and correct copy of search results from Craigslist (New Mexico listings) for a 1996 Lincoln Town Car posted between August 1 and August 15, 2025.
15. Detective Riley Rector and Defendant Bobbie Gurule are party representatives who may sit at the counsel table.

/s/ Dwight Harris
Assistant District Attorney

/s/ Sydney Gonzales
Defendant's Attorney

Applicable Law

Applicable Statutes

NMSA 1978, Section 30-16-2. Robbery.

Robbery consists of the theft of anything of value from the person of another or from the immediate control of another, by use or threatened use of force or violence.

Whoever commits robbery is guilty of a third degree felony.

Whoever commits robbery while armed with a deadly weapon is, for the first offense, guilty of a second degree felony and, for second and subsequent offenses, is guilty of a first degree felony.

NMSA 1978, Section 30-1-12. Definitions.

As used in the Criminal Code:

A. “great bodily harm” means an injury to the person which creates a high probability of death; or which causes serious disfigurement; or which results in permanent or protracted loss or impairment of the function of any member or organ of the body;

B. “deadly weapon” means any firearm, whether loaded or unloaded; or any weapon which is capable of producing death or great bodily harm, including but not restricted to any types of daggers, brass knuckles, switchblade knives, bowie knives, poniards, butcher knives, dirk knives and all such weapons with which dangerous cuts can be given, or with which dangerous thrusts can be inflicted, including swordcanes, and any kind of sharp pointed canes, also slingshots, slung shots, bludgeons; or any other weapons with which dangerous wounds can be inflicted;

C. “person” means any human being or legal entity, whether incorporated or unincorporated, including the United States, the state of New Mexico or any subdivision thereof; and

D. “anything of value” means any conceivable thing of the slightest value, tangible or intangible, movable or immovable, corporeal or incorporeal, public or private. The term is not necessarily synonymous with the traditional legal term “property.”

Relevant Case Law¹

In a case in which the identity of a robber was the main contested issue, the following evidence was sufficient to support the jury’s verdict of guilty: (1) Testimony from Clerk, who described the robber as a masked man with a horseshoe-shaped receding hairline, who was wielding a knife and wearing a dark-colored hoodie, dark shorts, and white shoes with black laces tied in a crisscross pattern; (2) a photograph of the defendant when he was arrested, which

¹ The legal authority provided here has been modified for the purposes of mock trial. The parties may not research or cite to any legal authority not provided.

showed that he had a horseshoe-shaped receding hairline, and that he was wearing black shorts and white shoes with small red stripes on the sides and black shoelaces laced in a distinctive crisscross pattern; (3) a photograph of the dark-colored hoodie recovered from the defendant's apartment; (4) a photograph of the kitchen knife recovered from his apartment and testimony from the Detective about where it was found in the apartment; (5) Clerk's statement that he was "100 percent positive" that the man he followed to the apartment building was "the same person" who tried to rob the store. *State v. Samora*, 2021-NMCA-029.

In a case involving a charge of aggravated robbery where the identity of the robber was the main contested issue, the following evidence of identity was insufficient to support a conviction under the *State v. Ramirez* factors: (1) Testimony of an eyewitness who (a) had a previous relationship with the defendant; (b) had a financial motive to identify the defendant as the robber; (c) had only "a few seconds" to see the robber; and (d) who testified at trial that he was "positive" the defendant was the robber, even though he did not name the defendant when questioned at the scene of the crime; (2) testimony of another eyewitness who saw the robber for 30 seconds and provided a description of the robber that differed in three material ways. *State v. Dyatt*, 2018-NMCA-409.

Jury Instructions

At the conclusion of a jury trial, the judge will instruct the jury how to apply the law to the evidence. Hypothetically, if the judge in your mock trial case were to provide instructions to the jury, they would look something like the following:

[Please note: A copy of these instructions may not be used as an exhibit during the mock trial competition; however, students may use these concepts in fashioning their case and making arguments to the jury.]

1. Role of Jury.

Members of the jury, you have seen and heard all the evidence and the arguments of the lawyers. Now I will instruct you on the law.

You have two duties as a jury. Your first duty is to decide the facts from the evidence that you have heard and seen in court during this trial. That is your job and yours alone. I play no part in finding the facts. You should not take anything I may have said or done during the trial as indicating what I think of the evidence or what I think about what your verdict should be.

Your second duty is to apply the law that I give you to the facts. My role now is to explain to you the legal principles that must guide you in your decisions. You must follow my instructions carefully. Each of the instructions is important, and you must apply all of them. You must not substitute or follow your own notion or opinion about what the law is or ought to be. You must apply the law that I have given to you, whether you agree with it or not.

Whatever your verdict, it will have to be unanimous. All of you will have to agree on it or there will be no verdict. In the jury room you will discuss the case among yourselves, but ultimately each of you will have to make up his or her own mind. This is a responsibility that each of you has and that you cannot avoid.

Perform these duties fairly and impartially. Do not allow sympathy, prejudice, fear, or public opinion to influence you. You should also not be influenced by any person's race, color, religion, national ancestry, or gender.

2. Jury sole judge of facts; sympathy or prejudice not to influence verdict.

You are the sole judges of the facts in this case. It is your duty to determine the facts from the evidence produced here in court. Your verdict should not be based on speculation, guess, or conjecture. Neither sympathy nor prejudice should influence your verdict. You are to apply the law as stated in these instructions to the facts as you find them, and in this way decide the case.

Although the lawyers may have called your attention to certain facts or factual conclusions that they thought were important, what the lawyers said is not evidence and is not binding on you. It is your own recollection and interpretation of the evidence that controls your decision in this case.

Also, do not assume from anything I may have done or said during the trial that I have any opinion about any of the issues in this case or about what your verdict should be.

3. Presumption of innocence; reasonable doubt; burden of proof.

The defendant, Bobbie Gurule, pleaded not guilty to the offenses charged. The Defendant is presumed to be innocent, and that presumption of innocence stays with Bobbie Gurule unless and until the State has presented evidence that overcomes that presumption by convincing you that Bobbie Gurule is guilty of the offense charged beyond a reasonable doubt. The presumption of innocence requires that you find Bobbie Gurule not guilty, unless you are satisfied that the State has proved guilt beyond a reasonable doubt.

The presumption of innocence means that Bobbie Gurule has no burden or obligation to present any evidence at all or to prove that they are not guilty. The burden or obligation of proof is on the State to prove that Gurule is guilty, and this burden stays with the State throughout the trial.

In order for you to find Gurule guilty of the offenses charged, the State must prove each and every element of the offense charged beyond a reasonable doubt. A defendant may not be convicted based on suspicion or conjecture, but only on evidence proving guilt beyond a reasonable doubt.

Proof beyond a reasonable doubt does not mean proof beyond all possible doubt or to a mathematical certainty. Possible doubts or doubts based on conjecture, speculation, or hunch are not reasonable doubts. A reasonable doubt is a fair doubt based on reason, logic, common sense, or experience. It is a doubt that an ordinary reasonable person has after carefully weighing all of the evidence and is a doubt of the sort that would cause that person to hesitate to act in matters of importance in that person's own life. It may arise from the evidence, or from the lack of evidence, or from the nature of the evidence.

If, having now heard all the evidence, you are convinced that the State proved each and every element of the offense charged beyond a reasonable doubt, you should return a verdict of guilty for that offense. However, if you have a reasonable doubt about one or more of the elements of the offense charged, then you must return a verdict of not guilty of that offense.

4. Direct and Circumstantial Evidence

There are two types of evidence. One is direct evidence, such as the testimony of an eyewitness, which directly proves a fact. The other is circumstantial evidence. Circumstantial evidence means evidence that proves a fact from which you may infer the existence of another fact.

As a general rule, the law makes no distinction between direct and circumstantial evidence, but simply requires that, before convicting a defendant, the jury be satisfied of the defendant's guilt beyond a reasonable doubt from all the evidence in the case.

5. Credibility of Witnesses.

You alone are the judges of the credibility of the witnesses and the weight to be given to the testimony of each of them. In determining the credit to be given any witness, you should take into account the witness's truthfulness or untruthfulness, ability and opportunity to observe, memory, manner while testifying, any interest, bias or prejudice the witness may have and the reasonableness of the witness's testimony, considered in the light of all the evidence in the case.

When an eyewitness identification is challenged, the jury may consider the following factors when determining what weight, if any, to give to the identification: (1) the opportunity of the witness to view the actor during the event; (2) the witness's degree of attention to the actor at the time of the event; (3) the witness's capacity to observe the event, including his or her physical and mental acuity; (4) whether the witness's identification was made spontaneously and remained consistent thereafter, or whether it was the product of suggestion; and (5) the nature of the event being observed and the likelihood that the witness would perceive, remember and relate it correctly.

6. Nature of the Information

As you know, the defendant, Bobbie Gurule, is charged in the information with violation of state law, robbery. The information is just the formal way of specifying the exact crime the defendant is accused of committing. As the information is simply a description of the charge(s) against the defendant, it is an accusation only. The information is not evidence of anything, and you should not give any weight to the fact that Bobbie Gurule has been charged in making your decision.

7. Robbery.

For you to find the defendant guilty of armed robbery as charged in Count I of the Information, the state must prove to your satisfaction beyond a reasonable doubt each of the following elements of the crime:

1. The defendant took and carried away money from a teller at the Lincoln branch of the Conchas Savings Bank or from the teller's immediate control intending to permanently deprive the teller and the Conchas Savings Bank of the money;
2. The defendant was armed with a handgun;
3. This happened in New Mexico on or about the 11th day of August, 2025.

For you to find the defendant guilty of armed robbery as charged in Count II of the Information, the state must prove to your satisfaction beyond a reasonable doubt each of the following elements of the crime:

1. The defendant took and carried away money from a teller at the Stash Junction branch of the Conchas Savings Bank or from the teller's immediate control intending to permanently deprive the teller and the Conchas Savings Bank of the money;

2. The defendant was armed with a handgun;
3. This happened in New Mexico on or about the 13th day of August, 2025.

8. Jury must not consider penalty.

You must not concern yourself with the consequences of your verdict.

9. Role of Jury – Deliberations; Unanimous Verdict, Duty to consult.

That concludes my instructions explaining the law regarding the testimony and other evidence, and the offense charged. Now let me explain some things about your deliberations in the jury room, and your possible verdicts.

You will be provided a copy of the jury instructions and the exhibits introduced as evidence will be made available to you.

Prior to beginning your deliberations, you will need to select one of you to act as foreperson. That person will preside over your deliberations and will speak for the jury here in court.

Forms of verdict have been prepared for your use.

You will take these forms to the jury room; when you have reached unanimous agreement as to your verdict, the foreperson will sign the forms which express your verdict. You will then return all forms of verdict, these instructions and any exhibits to the courtroom.

Your verdict must represent the considered judgment of each juror. In order to return a verdict, it is necessary that each juror agrees. Your verdict must be unanimous.

**STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL DISTRICT**

No. D-1226-CR-2025-00499

**STATE OF NEW MEXICO,
Plaintiff,**

vs.

**BOBBIE GURULE,
Defendants.**

Verdict Form

To the jury:

To further clarify instructions given to you by the trial judge, you are being provided with the following verdict form. At the conclusion of your deliberations, one copy of this form should be signed by your foreperson and handed to the court clerk. This will constitute your verdict.

Question 1:

Do you find that the State has proven beyond a reasonable doubt that defendant Bobbie Gurule committed armed robbery on or about August 11, 2025 as charged in Count I of the Information?

Yes _____ No _____

Question 2:

Do you find that the State has proven beyond a reasonable doubt that defendant Bobbie Gurule committed armed robbery on or about August 13, 2025 as charged in Count II of the Information?

Yes _____ No _____

Jury Foreperson

List of Witnesses

The prosecution and the defendant must call each of their respective witnesses. Bobbie Gurule is permitted to sit at counsel table as the defendant.

For the State of New Mexico:

- **Riley Rector:** detective;
- **Harper Van Zant:** bank manager;
- **Taylor Lightman:** computer forensics specialist.

For the Defendant, Bobbie Gurule:

- **Bobbie Gurule:** Defendant;
- **Dakota Prescott:** assistant floor manager, Cibola Casino;
- **Drew Armenta:** private investigator.

WITNESS STATEMENTS

Statement of Riley Rector

My name is Riley Rector, and I'm 45 years old. I am a Senior Detective with the Lincoln County Sheriff's Office, where I've worked for the last 22 years. I grew up in Lincoln County and graduated from Lincoln High School in 1998. I've wanted to be a detective since high school, partially, I admit, due to detective novels which I still enjoy. I thought about becoming a private investigator after high school, a sort of modern-day Sherlock Holmes. But I determined that public service would be more fulfilling and have better job security. Growing up here taught me the importance of job security; you wouldn't get by on luck and an unknown rich relative's passing. So, when I received a scholarship to New Mexico State University, I decided to major in sociology with an emphasis in criminology and penology. I earned my bachelor's degree in that field in 2002.

After attending and graduating (second in my class) from the New Mexico Law Enforcement Academy, I became a certified peace officer. In 2003, I became a patrol officer with the Lincoln County Sheriff's Office. In that role, I handled my fair share of "the usual sorts of calls...shoplifting, vandalism, that sort of thing" ... but here in Lincoln County, sometimes calls are unusual. One time, I remember, an older resident named Rayyan Adeeb called us with what he thought was the crime of the century. He had discovered a pile of fish guts in the Russian sage outside his house, and he was certain that his neighbor Finley MacPherson had dumped them there. It turned out, though, that Rayyan had gone fishing the day before and left his catch in a cooler by the side of his house. As the paw print in the garden proved, a coyote had smelled dinner, helped herself, and didn't bother to clean up. Needless to say, Rayyan was pretty embarrassed.

By 2009, I was making a name for myself by closing cases, and the higher-ups took notice. That summer, Sheriff Esparza promoted me to a position in the Detective's Bureau. I've worked in that role ever since.

Lincoln County's crime rates are fairly low, though I have investigated some homicides and an auto theft ring. In 2019, an anonymous tipster informed us that Garcia Auto Plaza, an unkept used car lot just north of the town of Rye, was running an auto theft ring. The lead was pretty thin, but I had long suspected there was something off about that lot, partially due to its owner's slimy personality on his annoying ubiquitous TV commercials and radio ads. I decided to follow my instincts, and it turned out Garcia Auto was at the center of the largest network of chop shops in the state. Now, thanks to my work, its owner and a bunch of other criminals working for him are in jail at least till 2028, where they belong. That case reaffirmed what I've always known about being a detective: Sometimes, you've just got to let your instincts lead the way.

As far as I'm aware, this case is Lincoln County's first bank robbery in modern times. On the morning of Monday, August 11, 2025, I was catching up on some paperwork in the office when I heard a call on our police radio from Diana Eltone, the Lincoln County weekday 911 dispatch operator. Ms. Eltone (everyone calls her Di, like Princess Diana.) said that a 911 caller reported a robbery at the Lincoln branch of Conchas Savings Bank. Patrol officers announced they were responding, and because I was on call for all incidents that would require further investigation, I responded. As I was running to my car, I was puzzled ... Lincoln is a relatively small town, which

means that the bank is not going to be sitting on huge piles of cash. Though since it was a smaller bank, perhaps the criminal figured they could get away easier. Plus, in terms of what's in the vault, Conchas Savings Bank isn't exactly Fort Knox. The Conchas Savings Bank only had two branches, one in Lincoln and the other about 30 minutes east in Stash Junction. I arrived in Lincoln at about 9:30 a.m. A Lincoln patrol officer had secured the scene and was talking with two witnesses who, I learned, were the bank's manager and assistant manager. I interviewed each separately.

I began with Harper Van Zant, the manager. Though understandably somewhat shaken, Harper was composed during the interview and answered each of my questions clearly. Everything Harper told me is reflected in Harper's affidavit, which I have reviewed.

When I finished with Harper, I spoke with Robin Canter, the bank's assistant manager. Unlike Harper, Robin was a nervous wreck. While we talked, his eyes kept darting back and forth, he stuttered, and he couldn't seem to focus: "Sorry, I'm in shock; that was just too much! Too far!" he said. Robin's recollection of the robbery was the same as Harper's — with one exception. When I asked for a physical description of the robber, Robin estimated that the robber was five or six inches taller and 30 or 40 pounds heavier than the person I now know to be Bobbie Gurule. The difference in Harper's and Robin's accounts of the robbery didn't bother me particularly, because a scared and flustered victim's perspective may create a memory of a larger or more intimidating perp. It seemed clear that Harper's description was the more reliable one since Harper was more composed. I've spoken with plenty of eyewitnesses in my years as a detective, and I know the psychological effect that shock can have on a person's memory. You see, the stress of a traumatic event like a robbery can make someone's memory a bit fuzzy; even just a few minutes after the event occurs, some people's memories get all hazy, and they can't remember details all that well.

When investigating a crime, if we are unable to catch the perpetrator "red handed" in the criminal act, we follow a standard investigative procedure. We meet with witnesses and get a description of the perp. If it's a robbery, like this one, we request a description and the amount of what was taken; review the nearby area for clues, including fingerprints, shoe tracks, wheel tracks; check any security cameras nearby or within the robbery location; create a profile; and often have a witness come and work with a sketch artist if the crime is really serious.

The bank hadn't captured the robbery on camera, and though we searched up and down, we couldn't locate any usable fingerprints. Our sketch artist was even out on maternity leave and couldn't come in to work to meet with Harper and Robin. At that point, the older, light-blue sedan was our only lead, which could have described a quarter of the cars in Lincoln County. Based on that evidence alone, there wasn't much we could do but hope for a breakthrough.

On Wednesday morning, we got what we hoped for, unfortunately. That morning, I was reviewing the case when Di called me again, relaying a report of another bank robbery at the other Conchas Savings Bank branch location in Stash Junction. I arrived 35 minutes later, at 9:40 a.m. When I arrived, a Lincoln Deputy Sheriff had secured the scene and was talking to five witnesses. The Patrol Officer indicated to me that two were tellers and three were customers.

I spoke first with one of the tellers, who told me her name was Chris Pacheco. She was visibly

83 shaken by the robbery and was breathing into a paper bag when I approached her. As I
84 approached, both of her eyes widened, and Chris dropped the paper bag. While still gasping for
85 air, Chris blurted out, "I can't believe that just happened! I thought I was going to die!" I find that
86 interviews run smoother when the interviewee is calm. I picked up the bag, handed it to her and
87 had her sit down on a curb nearby. I sat beside Chris and waited a few minutes, but Chris just
88 wasn't calming down. I had to meet with the other witnesses, so I began my questioning. Chris
89 tried to master herself and shakily told me what happened. She and her co-teller opened the bank
90 at 9:00 a.m. Three customers walked in followed by a loud bang. She was startled and looked up
91 to see a masked robber burst loudly through the front doors, brandishing a silver handgun. To
92 Chris's horror, the robber beelined straight for her and shoved a note in front of Chris demanding
93 that she put "everything behind the counter" into a paper bag. Chris did so, packing a little over
94 \$5,000 from the tills and a small safe into the bag. She handed it to the robber who, Chris
95 remembered, then sped away in an older, light-blue sedan (the make and model of which she
96 didn't recognize and whose license plate she didn't see). According to Chris, the robber didn't
97 say anything. Her voice still quivering, Chris gave the same physical description of the robber as
98 Harper (white sneakers, blue jeans, a black hoodie, a black mask, and black gloves) and indicated
99 that the robber was approximately the same height and weight as Bobbie Gurule. Chris also
100 explained that, after the situation at the Lincoln branch, the bank decided to upgrade its security
101 system, but a malfunction of the upgrade caused only the audio to be captured, which meant the
102 robbery wasn't captured on video.

103 When I finished with Chris, I turned to one of the customers. A minute or two into that
104 conversation, though, Chris tapped me on the shoulder. She seemed much calmer than before:
105 "Sorry about that, detective," she said coolly, "I just needed a minute. I'm better now." Chris said
106 she wanted to tell me two more things. First, Chris said, she was a little unsure of the physical
107 description she gave me just a moment earlier; the robber, she indicated, actually might have been
108 taller and heavier than her original statement suggested. Second, she had forgotten to tell me that,
109 as she was putting the money in the bag, she had slipped a small GPS device in with the bills. We
110 could access it using a cloud-based computer program, the login information for which she gave
111 me on a scrap of paper. I dropped everything — we had a chance to catch the robber! I
112 immediately called Taylor Lightman, the Detective Bureau's computer forensic specialist, and
113 relayed the login information. A moment later, Taylor told me: "Looks like your robber's heading
114 southeast on old highway 91 toward Wayfare. Go!" I jumped in my car with a patrol officer,
115 flipped on the siren, and sped away.

116 Wayfare is about 45 minutes south of Stash Junction. We had almost caught up to the tracker
117 when, to my dismay, Taylor called me back: "Looks like your robber dumped the tracker," Taylor
118 said with a groan. "It's on the exit ramp to Bow Canyon." We sped to the ramp, and about halfway
119 down the ramp, we located the device on the side of the road. I was beside myself. We had lost
120 what might have been our only chance to catch this robber! I paused for a moment and looked
121 over the ramp's barrier at Cibola Casino, which is located next to the highway and just off the
122 exit ramp. (Exhibit 1 shows the ramp, the place where I found the GPS device, and the casino.
123 The distances indicated on the exhibit are accurate.)

124 I thought we had hit another dead end. I drove back to Stash Junction and interviewed the
125 remaining witnesses, none of whom were able to tell me anything useful about the robber. And,
126 like the Lincoln robbery, we weren't able to locate any usable fingerprints in the bank itself.

The next day, though, we caught the break that ended up solving the case. Out of the blue, Harper called me and told me that one of the bank's customers, Bobbie Gurule, had just come into the Lincoln branch and paid off their mortgage in full. "So what?" I asked. "Well," Harper said, "Bobbie's been delinquent in paying for months now. If Bobbie hadn't gotten current by Friday, we were going to foreclose on the property." Harper told me that Bobbie had won the money at Cibola Casino and added "but I don't believe it." In that moment, it all clicked; Bobbie had robbed the bank to avoid losing their property. I drove down to the Lincoln branch of the bank and collected the check that Bobbie had used to pay off the mortgage, which had been issued from Cibola Casino. I also asked and received a copy of the portion of the Employee Training Manual, that spells out what to do in the case of a robbery. You can't have too many pieces of evidence! I then went to Cibola Casino and obtained a copy of Bobbie's transaction log from August 11 and August 13, 2025. Now that I had all of this damning evidence, I knew then that I had to talk directly with Bobbie. I looked up Bobbie's address and drove over there.

When I arrived, I saw a small house on what looked like an average-sized lot. I walked up, wearing plain clothes, knocked on the door, and Bobbie answered, still dressed in pajamas, though it was midafternoon. Bobbie looked annoyed with my presence, and had a no-nonsense demeanor. "What's this about?" Bobbie asked abruptly. I hadn't yet identified myself as law enforcement, but Bobbie's defensiveness told me I was on the right track. I didn't want to tip my hand before taking Bobbie's temperature, so after identifying myself as Detective Rector of the Lincoln County Sheriff's Office, I told Bobbie that we had received a report that a car had been stolen in the area — an old, light-blue sedan, to be exact. Had Bobbie seen a car matching that description? Bobbie hesitated and muttered, "Well, um ... I used to own an old, blue Lincoln, but I sold it earlier this week. I needed some cash." I asked Bobbie who they sold it to. Bobbie hesitated again, and after a beat said, "I can't remember. It was just some guy I connected with on Craigslist, though the idiot forgot the title and hasn't responded to my requests to get it to him." It was then that I knew I had to make my move: "Where were you on Monday morning?" Bobbie's eyes widened at that question. "Monday?" Bobbie stammered. "I, uh....I was at home." I continued, "Anyone with you? Anyone who can verify that?" Bobbie said, "I mean no; I guess not. I was at home watching TV the whole morning," Bobbie said weakly. I asked Bobbie the same question about Wednesday morning and got the same answer. "Look," Bobbie said, "I really need to get going. Can you come back later?" Bobbie then slammed the door shut in my face and never asked why I wanted to know their whereabouts on Monday and Wednesday.

I returned later — with warrants for Bobbie's arrest and to search the house. In the house, in a desk drawer, we found the title to a blue 1996 Lincoln Town Car, a copy of which is shown in Exhibit 3. We also found a black hoodie, jeans, and black leather gloves. We didn't find white sneakers, a mask, or a gun, but I figured Bobbie or anyone who watched a cop show knew to ditch those. The 1996 Lincoln was not in the garage at the time we arrested Bobbie, and it has not been located. We also didn't find any cash, but Bobbie clearly had gone to the casino and earned quite a bit of money.

I'm sure Bobbie is our robber. We never looked at anybody else for the crime, but why would we? Just to confirm Bobbie's eyewitness account, I wanted to talk more with Robin Canter about the physical description of the robber, but I wasn't able to locate him. I visited both his apartment and the Lincoln branch of the bank, but he had stopped coming to work a few days after the robberies. As far as I could tell, he disappeared.

After Bobbie was arrested, I learned about this cockamamie story about Bobbie selling their car on Craigslist. I looked on Craigslist for an ad selling a 1996 Lincoln in New Mexico. I found three listings between August 6 – August 11, 2025. I didn't try to subpoena Craigslist to see if they had any archived ads because, from what I've heard from other detectives, Craigslist doesn't save deleted listings for more than one day after their deletion. Doesn't matter, though — all the evidence points to the fact that Bobbie is guilty.

I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all relevant testimony, and I followed those instructions. I also understand that I can and must update this affidavit if anything new occurs to me until the moment before I testify in this case.

Riley Rector
Signature

Statement of Harper Van Zant

I'm Harper Van Zant, and I'm 35 years old. I live in Lincoln, New Mexico, where I'm the newest manager of Conchas Savings Bank. I work out of the main branch, which is located in Lincoln. Conchas Savings Bank is a small operation, but we are an important part of the community. We just celebrated our 90-year anniversary and received an award from Lincoln County for being one of the oldest community banks in the State of New Mexico. We've helped countless people in Lincoln County buy a home, start a business, or get through a rough patch financially. Our first loan, actually, was made in 1932 to the founders of Feldman Seed Farms. Believe me, that was a tough time to be making loans, but our founder thought that J.P. Morgan had it right; the first thing when it comes to credit is character, before money or anything else. Our founders had been friends with the Feldmans for years, and they knew that their farm would turn out to be a success. They repaid the loan in full and on time, and Feldman Seed Farms has been one of our valued clients ever since.

I've known Bobbie Gurule for a couple of years. The bank has long used a company called Downey Security LLC to manage our security system, and every couple of months, they send a technician, driving a company van, to each of our two branches to make sure everything's working as it should. I can't remember exactly when, but beginning at some point in 2017 or 2018 (or maybe it was 2016?), Bobbie became our technician. I liked Bobbie well enough. Bobbie was typically pretty quiet and businesslike. When Bobbie conducted inspections, a teller would let Bobbie back behind the counter, where Bobbie would inspect our security system and alert buttons. Bobbie had access to everything behind the counter, so Bobbie surely would've seen the amount of cash we typically have on hand.

In 2020, Bobbie was wrapping up an inspection and popped into my office to let me know the inspection was complete. "Hey Harper," Bobbie said, "I'm thinking about buying this beautiful little house on the edge of town. Do you think I would qualify for a mortgage?" I was glad to help and we ended up loaning Bobbie the money needed for the purchase. Bobbie had gone on and on in my office about how the house was their "dream home," and — at the time, anyway — I was happy to have been a part of it. For a time, everything went smoothly. Bobbie made the monthly payments in full and on time and continued visiting us every couple of months to inspect our security system. Toward the end of 2024, sometime in November or December — I can't remember when, exactly — Bobbie was wrapping up an inspection and flagged me down in the hallway. Bobbie said, "Your video cameras are looking pretty old. If you want, we can get you some upgraded cameras with much better resolution." Bobbie quoted me a price, which I thought was reasonable. I said "ok," in response to which Bobbie said: "Okay, great. I'll get the installation scheduled. There's a lot of demand for these, so it may be delayed until July or August." We ended up scheduling the installation for August of this year. The installation meant that the cameras would be down on the day of the install, which is why the Lincoln branch and the Stash Junction branch did not have cameras working on the days of the robberies.

In January, we had an inspection scheduled, but it wasn't Bobbie who showed up. The new inspector — her name was Beth, I think — said that Bobbie had been let go from Downey Security. Beth told me that she heard a rumor that Bobbie had been stealing from the company, which as a former customer, a bank, and as the mortgage owner, was pretty concerning. Bobbie

43 had access to basically all the secure areas of our branches when performing inspections. None
44 of our records showed a major discrepancy after the inspection days, but it is possible that Bobbie
45 managed to snag a few dollars here and there each visit.

46 Bobbie made the February mortgage payment, but in March, we received no payment, and
47 Bobbie did not reach out to the bank. The silence and lack of payment continued through May. I
48 tried calling Bobbie toward the end of April using the telephone number on Bobbie's account, but
49 I got a prerecorded message indicating that the line had been disconnected. I am not sure if the
50 number was for a landline or cell number. In mid-May, I decided to drive out to Bobbie's house
51 in person to see what was going on. When I got to the house, it was looking pretty dilapidated;
52 the area around the house was filled with tall weeds, the mailbox was stuffed to the brim, and
53 there was a huge pile of trash accumulating in front of the garage, which was closed. (I didn't see
54 a vehicle on the property, but I assumed it was in the garage.) I knocked on the front door, and
55 Bobbie answered, saw it was me.

56 Bobbie looked just as dilapidated as the house; there were huge bags under their eyes. I told
57 Bobbie I had been calling and hadn't been able to get through. When I asked whether everything
58 was okay, Bobbie told me they had lost their job in January and were going through a rough patch.
59 However, one thing Bobbie said that stuck with me was "Money-wise, I've just really been in a
60 jam, a bad one."

61 I wanted to be as compassionate as I could, while addressing the needs of the bank. I asked if
62 Bobbie would be able to start payments up again soon, but they just hemmed and hawed about
63 not having a job and trying to find something. According to bank procedure, we would begin
64 foreclosure proceedings after 120 days of non-payment. I told Bobbie that, but I'm not sure if the
65 message sunk in. I told Bobbie: "Normally, we'd begin foreclosure proceedings after 120 days
66 on nonpayment, which would put us at about June 1st, but I think we can be flexible. Do you
67 think you'll be able to get back on track by July 1st?" To which Bobbie said, "I'll do my best,"
68 pretty halfheartedly. I thanked Bobbie and walked away hoping for both of us that they would
69 soon get back on their feet.

70 Unfortunately, though, July 1st came and went, and the bank still hadn't received a cent from
71 Bobbie. Mid-July, I drove out to Bobbie's house again, but when I knocked on the door, nobody
72 answered, although I'm positive I heard footsteps inside. (The mailbox, I noticed, had been
73 emptied.) At that point, I, as the bank manager, was out of options; we're a small bank, and we
74 had "floated" Bobbie for as long as we could. On July 26th, I sent Bobbie a letter indicating that
75 the bank would begin foreclosure proceedings on August 15th if the overdue loan payments
76 weren't received by that date. Exhibit 4 is a copy of the letter I sent. Sending letters like that is
77 undoubtedly the worst part of my job, but unfortunately, it's an unavoidable reality in the banking
78 business.

79 On the morning of August 11th, I arrived at the Lincoln branch a little before 9:00 a.m. to open
80 things up. We were scheduled for the installation of our new cameras that day around 9:30 or 10
81 a.m. Robin Canter, our assistant manager, arrived before me to disconnect the cameras, so the
82 installation would go quickly. We were told by our new inspector, Beth, that the installation would
83 only take thirty minutes, and our cameras would be up and running fairly quickly after that. I
84 waived at Robin, who was straightening up the lobby and had just unlocked the bank's front door,

85 and turned to go to the counter. I was halfway to the counter when I heard rapid footsteps entering
86 the lobby. When I turned around, I froze. There was a person dressed in white sneakers, blue
87 jeans, a black hoodie, a black mask, and black gloves. The person was approximately the same
88 height and weight as Bobbie. Given the disguise, I couldn't have said with absolute certainty that
89 the person was Bobbie, at least not at that time. Truth be told, though, I was more concerned
90 about the small, silver handgun pointing directly at my chest. With the person's other hand, the
91 person threw a paper grocery bag and a crumpled note at my feet, which, when I unfurled it, read
92 in computer-printed font: "PUT EVERYTHING BEHIND THE COUNTER IN THE BAG." The
93 person didn't say anything but gestured toward the counter with their free hand and gestured to
94 Robin to move behind the counter, too. I was concerned for Robin; he was just a kid. He's worked
95 at the bank since graduating from the local high school. I guess it's been two or three years now.
96 Robin's family was always struggling for cash, and he hoped a job at the bank here would help
97 him save up for college, so he could leave this area. Both of us were shaking; Robin and I moved
98 behind the counter and emptied the tills and the contents of a small safe behind the counter into
99 the bag, which I then placed on the ground in front of the person. The alert button was under
100 Robin's till, and if he had remembered his training and pressed the button, perhaps the robbery
101 would have never been successful, or the second one would have never taken place. Anyway, we
102 put a little over \$3,000 in the bag and tossed it over the counter. As soon as the bag hit the floor,
103 the person grabbed it, ran outside, jumped into what looked like a light blue sedan, and sped away.
104 I didn't catch the make, or model, or license plate – it's possible that the car didn't even have
105 plates on it. I was in shock! What's more, it occurred to me at that moment that we wouldn't have
106 video of the robbery. Now that I think about it, I think it was Bobbie who scheduled the
107 installation.

108 As soon as I could compose myself, I asked Robin if he had alerted the police. Robin's face was
109 pale, and he shook his head. I decided that it wasn't the time to remind him of his training, so I
110 reached under the teller's counter and hit our alarm. A patrol officer from the Lincoln County
111 Sheriff's Office arrived about 20 minutes later. (I guess they had to drive all the way down from
112 Rye; Lincoln is small enough that it's only got two cops in its police department, and neither
113 seemed to be on duty that morning.) A detective named Riley Rector arrived a few minutes after
114 that, and I told the detective everything that had happened. I also mentioned – probably with some
115 frustration in my voice – that Downey Security was in the process of replacing our security
116 cameras, so nothing was caught on video.

117 In the day or so that followed, I still couldn't believe it. Why would someone rob a small
118 community bank like ours? It just seemed so senseless. You can only imagine my shock when I
119 heard from Detective Rector on Wednesday that our other branch had been hit by the same robber
120 on the day of installation. This is crazy because we pushed for that installation to happen faster
121 than originally scheduled. Given what happened here, I couldn't imagine who would do such a
122 thing.

123 On Thursday morning, at about 10:00 a.m., Bobbie Gurule walked into the Lincoln branch. I was
124 surprised, given Bobbie's prior lack of communication. "Bobbie!" I said with a smile, "What
125 brings you in today?" "Hi Harper," Bobbie said. Bobbie looked relieved but nervous. Bobbie
126 looked a little worse for wear and may have lost some weight. "Um, I have this for you." Bobbie
127 handed me a check for \$5,212.14 – which was the exact amount that Bobbie was in arrears on
128 their mortgage at that point, including late fees. By making that payment, Bobbie would be current

on payments due on the loan. Presumably, Bobbie had been receiving the paper mortgage statements we send in the mail each month; that's the only way we communicate that sort of information to our customers. At first, I was elated. "Wow, Bobbie!" I said. "Mind if I ask how you came up with it?" To which Bobbie responded with a smile, "Just had a lucky night at the casino." I laughed, didn't think much of it, and shook Bobbie's hand as hard as I could, telling them that the bank would not continue with foreclosure, and reminded Bobbie that they still had to make monthly payments.

As Bobbie walked out the door, though, a darker thought came over me. We were just robbed, and Bobbie had miraculously come up with money to get current on their mortgage and avoid a foreclosure. Was Bobbie the robber and was Bobbie paying us back with our own money? Immediately, I called Detective Rector and recounted what happened. Detective Rector came by to collect Bobbie's check, and, well, I guess that's how I ended up writing this thing.

After thinking about it, I am sure Bobbie robbed us. Bobbie looked a lot like what I remembered of the robber. And, how else could Bobbie have come up with that much money so fast? In September, they paid their monthly mortgage payment – a little over \$600 – in cash, mostly in \$5, \$20, and \$50 bills. Unfortunately, we don't have the technology to determine whether those bills are the same ones that were behind our counters on the days of the robberies, but I can tell you that most of the cash we keep behind the counter is usually in those denominations. The next month, shortly before Bobbie's payment was due, we received direct deposit authorization paperwork from a place called Hinkle Espresso House. Since then, we've received regular mortgage payments from Bobbie via direct deposit. I assume Bobbie got a job at Hinkle.

A few days after the second robbery, I arrived at the bank for work, and Robin was nowhere to be found. That was really odd, I thought. I hired Robin, even though he had a bit of a reputation of shoplifting as a high school student, but who in high school doesn't make mistakes? Robin was punctual and had been a thoroughly reliable employee. Robin hasn't returned, and I haven't heard from him since then. For a moment, I was tempted to wonder whether Robin was in on the robbery, particularly because Robin and Bobbie seemed to be pretty friendly whenever Bobbie stopped by for an inspection. In fact, a few times, I heard the two of them talking together about how much they liked the movie *Butch Cassidy and the Sundance Kid*. But the thought that Robin would've actually committed a robbery in real life? That's ridiculous. Sure, Robin can have a temper – I've had to talk with him a few times about speaking a bit too aggressively with disgruntled customers – but I just can't see Robin having a hand in this. Robin was one of the victims, after all!

I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all relevant testimony, and I followed those instructions. I also understand that I can and must update this affidavit if anything new occurs to me until the moment before I testify in this case.

Harper Van Zant

Signature

Statement of Taylor Lightman

My name is Taylor Lightman, and I'm 24 years old. I work in the Detective's Bureau of the Lincoln County Sheriff's Office as a computer forensic specialist. I grew up in Rye, and I now live and work, right here.

I guess you could say I'm an all-purpose computer nerd. When I was a little kid, my parents bought me a copy of Myst, the old computer game, and I was completely entranced. It was like I had been dropped into a totally new world! It didn't take long for me to wonder how games like that were built, and before long, I was learning to code in Java and C++. When I was 11 years old, I managed to program my own text-based version of Myst – I called it Fogg – and by the time I was 17, I had a regular side-hustle as a freelance coder.

I still code for fun, but by the time I got to college, I had become curious about the electrical technology underlying the coding platforms on which I was doing most of my work. So, after a period of vacillating, I decided to double major in physics and computer science. I earned my bachelor's degree in those fields from Stanford University in 2022. Right after college, I worked for a bit as a coder at Ring-a-Ding, a social media platform based down in Palo Paquito, California, but I grew bored of that pretty quickly. (You can only watch so many cat videos before going completely bonkers, you know?) After about a year and a half, I handed in my notice and returned home to Rye. It took me a minute to figure out what I wanted to do next, but I have a friend named Frankie Zapata who works in the Santa Fe County Sheriff's Office. Frankie ended up putting in a good word for me with the Lincoln County Sheriff's Office, which, it turns out, was in need of a computer forensic specialist. In 2024, I accepted their offer, and I've worked with the Sheriff's Office since that time. In 2024, I completed a continuing professional education course at the University of New Mexico in cybersecurity and computer forensics. As a result, I earned a CompTIA Security+ certification. ("CompTIA" is short for the Computing Technology Industry Association, which is one of the information technology industry's leading trade associations.)

My day-to-day is pretty diverse. If it's computer-related, and if it's involved in some sort of criminal enterprise, chances are I've worked on it. You'd be shocked – or maybe wouldn't – how often criminals rely on things like text messaging and social media when committing crimes. It's way easier than most people realize for me to dig up computer forensic evidence on a person's laptop or smartphone. In fact, a few years ago, I helped Frankie out on a case in which the defendant had done searches for "criminal penalties for threats" on her smartphone before posting a bomb threat on Facebook. Frankie and I extracted that data from her phone, and she ended up getting prosecuted.

Anyway, this case involves global positioning system or "GPS" technology, with which I've got plenty of experience in. In college, I attended several lectures given by Professor Bradford Parkinson, who developed much of the technology underlying the GPS system in the 1970s. That technology, as well as its various law enforcement applications, was also a key topic covered during my classes at Stanford. And, maybe most saliently, I've worked several times with GPS technology while at the Lincoln County Sheriff's Office. For the most part, I've used the technology to locate automobiles that officers believe are or will imminently be involved in

criminal activity. All of the work I've done with GPS systems, including my work in this case, has been based on what I consider to be sufficient facts and data. It's similarly based on what are widely accepted as reliable principles and methods, all of which I have applied reliably in the cases I've worked on.

On the morning of August 13, 2025, I was sitting at my desk tinkering with an infrared camera when I received a call from Detective Riley Rector. Detective Rector said, "Grab a pen. We've got another robbery down at Conchas Savings Bank, and it looks like one of the tellers managed to slip a GPS device into the bag of cash." I practically fell out of my chair. I had heard about the first robbery, but with the cameras down and no evidence left at the site needing my expertise, I had not followed the investigation closely. I knew from Detective Rector that we basically had zero leads. Detective Rector told me that the GPS device was one manufactured by a company called 4XT Security Systems, a company based in New Mexico. I'm familiar with those systems – in fact the Lincoln County Sheriff's Office has used them in other contexts before – and I was glad to know that I'd be working with technology with which I was familiar, and which I consider to be especially reliable.

Let me pause for a moment, though, to explain how GPS technology works. It involves two basic components: a "receiver," which is the tracker whose position we're monitoring on the ground, and "satellites," which orbit the earth and are used to determine the receiver's position with precision. The basic concept is fairly simple. The satellites broadcast electromagnetic waves to the receiver, which are modulated to convey information concerning the time at which the signals are transmitted. Unsurprisingly, these are called "time of transmission" or "TOT" values. Then, when it receives the signal, the receiver calculates the signal's time of arrival (a "TOA" value) based on its own internal clock. The difference between those values is called the "time of flight" or "TOF" value. Because the speed of those waves is, as a matter of physics, always going to be constant, the TOF value will be proportional to the distance between the satellite and the receiver at that moment. Using a similar process, the system can independently determine each satellite's position at each TOT, so based on that data and the receiver's TOF value, the receiver can calculate exactly how far away from the satellite it is at that moment. Sounds simple enough, right?

Well, it's actually a little more complicated. In order to accurately determine the real position of the receiver, you need to calculate four separate values. After all, if I simply told you that I was a hundred feet away from you, you wouldn't know exactly where I was based on that information alone, would you? Are you a hundred feet in front of me? Behind me? Above me? The first three values correspond to what are commonly known as Cartesian coordinates, i.e., latitude, longitude, and height relative to the geoid (which essentially means height above sea level). The fourth has to do with the difference between the satellites' clocks and the receiver's clocks. While the satellites all have extremely reliable atomic clocks, it's usually going to be impractical to put an atomic clock into a receiver, particularly one as small and inexpensive as the one we're discussing here. That means there will almost always be small differences between the receiver's clock and the satellites' clocks, which, in order to accurately calculate the receiver's position, need to be accounted for.

So, four values means that a receiver needs four satellites in order to calculate its location accurately. Based on those four values, the receiver then can calculate its position, which a user

85 can see in an overlaid map; think of what you typically see on your phone when you open your
86 “Maps” app.

87 GPS technology, including the 4XT system that I was using on the 11th, is extremely reliable.
88 There currently are 32 GPS satellites orbiting the earth in different positions, which means it’s
89 virtually impossible for a receiver anywhere in the world to have access to fewer than the required
90 four at any given time. In fact, a given receiver often has access to between six and ten satellites
91 at any given moment; that extra data makes the positioning process even more reliable.

92 Like any computer system, though, the GPS system isn’t 100% perfect. There are two primary
93 aspects of it that can lead to small imperfections, although I have to emphasize that such errors
94 are usually only a matter of a few feet, if that. First, in some cases, GPS satellites will sometimes
95 “drift” in their orbits, leading to miniscule errors in the way we calculate their position here on
96 earth. Such errors are corrected on a daily basis, but if you’ve got a TOT value that’s off by a
97 microsecond, it’s possible that you’ll end up with a GPS location that’s slightly off. Again,
98 though, we’re usually talking about no more than a few feet, if not inches. And the fact that there
99 are usually more than four satellites connected to a receiver at any given time makes this a really
100 remote possibility, although it is theoretically possible.

101 Second, we’ve got to keep in mind that, in this case, the receiver I was tracking wasn’t in a static
102 position; it was moving. That adds another layer of complication, because the continuous
103 movement you see when you open your “Maps” app on your smartphone when you’re riding in a
104 car is actually a little misleading. In that case, the GPS system isn’t tracking your location on a
105 continuous basis; rather, it’s collecting a series of data points over time that happen to be close
106 together. What’s key here is that the software underlying the program isn’t just doing it
107 retrospectively. Instead, it’s using that data – as well as artificial intelligence – to predict where
108 it thinks the receiver will go next. Take a simple example: If you detect a receiver at one point on
109 a road at 11:45:30, and then the receiver moves 100 feet east on the same road at 11:45:31, the
110 system is going to predict that the receiver will be 100 feet farther east on the same road at
111 11:45:32. Sometimes, this can lead to small errors. Take the same example. Let’s say you’re in
112 the car, and you’ve made a right turn at 11:45:31. For a brief moment, your “Maps” app might
113 show incorrectly that you’re continuing straight, rather than turning right, because that’s what the
114 prior two data points suggest.

115 Anyway, back to this case. After logging into the 4XT online system and entering the login
116 information that Detective Rector gave me, I saw a blue dot traveling southeast on the old
117 highway 91, from Stash Junction toward Wayfare. So, I yelled into the phone, “It’s going to
118 Wayfare on old 91 – get after ‘em!” I then said I’d call back with any updates and hung up the
119 phone. About 35 minutes later, I was watching the blue dot approaching the Bow Canyon exit,
120 just outside of Wayfare. The dot appeared to pass just beyond the exit, but then, it reappeared at
121 a location on the exit ramp, off the highway. I thought it might just be a temporary error with the
122 system, but alas, the dot stopped moving there. Exhibit 1 is a screenshot of the map that I saw on
123 the screen at that moment. I’ve indicated in a red marker the last place on the highway that I saw
124 the blue dot before it came to rest on the exit ramp.

125 I would have liked to try to confirm that the blue dot I saw on the screen actually was Bobbie
126 Gurule, but given the information I had, I wasn’t able to do that. The only real way I could have

done that with certainty would have been to run a geofence search, but we weren't able to acquire any sort of electronic identifier unique to Bobbie that would have allowed us to do that. Our best bet would've been Bobbie's personal email address, but we weren't able to locate that.

Regardless, in my expert opinion, the data I viewed while watching the blue dot on the 4XT online system compels the conclusion that the car exited the highway at Bow Canyon, rather than continuing along the highway. True, the blue dot did appear briefly at a point beyond the exit, but that's likely due to the predictive technology I discussed above; after all, the car had been moving continuously southward on old highway 91 for about 30 or so minutes beforehand, and, in my experience as a coder, I'd say it'd be natural for that or any other software program that incorporates predictive technology to predict that the car would simply continue along on the same road. To be fair, I can't say exactly how it got to the place where Detective Rector ultimately found it. Given the data I saw on the screen, it's possible. I suppose that a driver threw it out of the window while continuing along the highway. But, in that case, it's likely that I would've seen the blue dot move once or twice along the exit ramp. The data is much more consistent with a scenario in which the driver exited the highway, slowed down, and simply dropped the device out of the window. Plus, I'm not sure about you, but think about how far a throw that would've been – I certainly couldn't have done that!

I did submit a geofence search warrant to Google for any accounts that were present at both robberies, but it was of no investigative use. First, Google didn't respond to the search warrant until about a week ago. They are always so late, claiming they don't have the resources to respond in a timely manner, which seems pretty sketchy. Second, Google said there weren't any devices that were present at both robberies. This is not that unusual. You always hope for a home run with a geofence warrant, but people are a lot better these days about controlling their location settings on their mobile devices. I was hoping that we would find Bobbie's cellphone when Bobbie was arrested, but we were never able to find one. (Often, the phone will have more location information than we can glean from Google.) I couldn't do anything else because I didn't know Bobbie's phone number, email account, or anything else that would allow me to seek more location information. So that was all pretty much a dead end.

I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all relevant testimony, and I followed those instructions. I also understand that I can and must update this affidavit if anything new occurs to me until the moment before I testify in this case.

Taylor Lightman

Signature

Statement of Bobbie Gurule

My name's Bobbie Gurule, and I'm 27 years old. I live in Lincoln near the city park.

I was born in Wayfare and graduated from Hamilton High School back in 2014. Back then, I was interested in two things, playing soccer and music. I was a pretty good striker on the soccer field; some scouts checked me out, but music was my real passion. So, when I graduated, I figured I'd try to join a band. I'm a bass player, so I figured it'd be easy. (We're supposed to be in high demand, you know?) As it turned out, though, the first few years were kinda rough. I waited tables, worked odd jobs, and did my best to save money while I was looking for a permanent gig. I have to say that I hated being constantly short of cash. I ended up having to borrow money a few times from my friends, and on more than one occasion, I did my best to pay the money back. The thought of not paying all the money back still makes me sick to my stomach, but, at the time, I didn't really have any other options, and I did my best. My friends did stop loaning me cash eventually, but I hit the jackpot in 2014.

I finally landed a permanent place in a rock band called "Marlo Hubbard and the New-Age Knuckleheads." It was led by a guy named Marlo Hubbard, who, in retrospect, was a real piece of work. Marlo imagined himself – and yes, these were his exact words – as "Paul McCartney reincarnated." I reminded him often that Paul McCartney wasn't actually dead, but Marlo didn't seem to let that minutia bother him.

Marlo basically exercised dictatorial control over every aspect of the band; he chose the songs, picked the gigs, decided who got to solo, and – most irritatingly to me – controlled the money with no visibility. I had no idea how much money we were making, but I am sure he was shortchanging me. As if that wasn't enough, he was always needling me with jokes about bassists, which definitely aren't funny. ("What do a bassist and a lawsuit have in common? Everyone feels a lot better when the case is closed!") My last straw came when, following a gig, Marlo tried to dock my pay because he thought I had been out of tune for the second half of the show. I was barely making enough for food and rent, so I more or less snapped. I yelled at him and, well, things got a little out of hand. I punched him pretty good and, while he was distracted, grabbed a bit of cash from his wallet to cover what he owed me.

That was, unfortunately, the end of my time in music. I started waiting tables and basically going back to what I did right after graduation. By 2016, I had earned just enough to make a life change. So, I packed up what little I had and drove down to Rye. After a week or two in a motel, I found an apartment, and, in few weeks, I found a job as a landscaper at the Rye Community Association. It was hot, hard work, but I enjoyed being outside and liked working with my hands. At night, I attended computer security classes at Rye Community College, and I ended up earning my associate's degree in that field in 2020. With my new degree, I knew that I could find a better paying job and stop living paycheck to paycheck. A few weeks after that, I got a job at Downey Security, a small company based in Rye, that installs and manages security systems across the state.

As a Downey technician, I had a regular rotation of companies where I did periodic inspections. Conchas Savings Bank was one of those companies. It was a small bank with branches in both Lincoln and Stash Junction. During my first few years as their security specialist, I got to know

Harper Van Zant, the bank's manager, reasonably well. I liked Harper well enough, I suppose, but, in my opinion, Harper is definitely a penny-pincher – and is willing to shade the truth if it can help Harper make an extra buck. More than once, I've performed services or installed bank upgrades that Harper has verbally approved in advance. Then, when my office would get the bill, Harper would tell us they didn't approve those expenses and wouldn't be paying for them, even though they knew perfectly well that the bank owed us the money. I stopped suggesting upgrades for that reason. I didn't want to ruin my relationship with Harper. I don't remember ever suggesting to Harper that the bank install a new security system, much less scheduling any such installation, but frankly I'm surprised Harper would have agreed to it. Regardless, if Harper had agreed to a rescheduling, scheduling the installation sounds like something I might have done, I guess – I had regularly done it with other customers – but I just don't recall ever doing it with Conchas Savings Bank.

Back in 2020, I had just finished up an inspection at the bank and popped my head into Harper's office. See, I had finally saved up enough money for a down payment on a house; it had been my dream to own a home since I arrived in Lincoln County, and I had recently found this wonderful little property near downtown Lincoln. It was small, but it was (and is) my dream house! It has two bedrooms, a wonderful kitchen, and a great deck that backs up to the city park. Even better, it's a short walk, like maybe ten minutes, to my favorite coffee shop, Lincoln Perk Yogurt and Coffee. I go there just about every morning to get my day going.

I needed a mortgage to finance what the down payment wouldn't cover, so I asked Harper if the bank would be able to help. Harper was very willing to help and sat down with me right away to run some numbers. Harper did seem a bit concerned when they ran my credit report, which was understandable. My credit wasn't stellar. I remember thinking that the house was going to slip through my fingers. I still remember exactly what happened next. It was honestly one of the biggest miracles in my life.

Harper said my credit wasn't "exactly stellar." They said, "This isn't something we'd normally do, but for you, we'll make an exception." I remember them winking and grinning and saying "Just don't make me look bad." I signed the paperwork the next month, and before I knew it, I was living in my dream home. I had never been happier! Finally, I felt like I had made something of myself, and I was living my American dream, you know?

Things went fine for a few months. The money I was earning from Downey was good, and I made my monthly payments each month on time and in full. In late 2024, I even started a DIY construction project to expand my back deck. In January, though, I got blindsided. Just after the new year, my boss, Jolie Naranjo, called me into her office and delivered what turned out to be horrible, shocking news: Downey Security was firing me, effective immediately. I couldn't believe it! Jolie claimed that I was embezzling money, but instead of reporting it to the police she was just going to fire me. I couldn't believe what I was hearing. I asked what proof she had, and she just said, "I have enough. Go collect your things and turn in your keys." Still in shock, I stumbled out of Jolie's office. What she was telling me was absolutely, positively untrue. I had never stolen anything from anybody, and, to this day, I have no idea why I was let go. As I trudged into the parking lot with my things, I felt tears welling up in my eyes. What was I going to do?

I had spent most of my savings on the materials I needed for my new deck, and if I still wanted

84 to eat and pay the utility bills, I had enough money left for one month's mortgage payment. I paid
85 the February payment, but come March, I just couldn't scrape enough together. My
86 unemployment was minimal, and not enough to cover my mortgage. I was trying as hard as I
87 could to get a new job, but since I obviously wasn't going to get a reference from Downey, my
88 options were limited. March, April, and May passed, and I didn't make my payments. In
89 retrospect, I wish I had reached out to the bank to talk things through – Harper had been so kind
90 to me, I now feel like maybe I owed Harper that – but I was just too embarrassed to pick up the
91 phone. Plus, in May, the phone company disconnected my landline for non-payment of my
92 monthly fees, which is the only number I had given to the bank. I still had a Google Pixel
93 cellphone which runs on the Android system and is logged into my personal Google account, so
94 I didn't think it was a big deal to lose the landline. You can't get by these days without a cellphone,
95 and I take it everywhere with me. Some of my friends seemed shocked that I always had my
96 location service on and just didn't care much about security on my phone. The government can
97 track me regardless of what I do, so I don't worry too much about it.

98 Sometime toward the end of May, I heard a knock on my door, and when I answered, it was
99 Harper. Harper asked if everything was okay, in response to which I explained that I had lost my
100 job and was going through a bit of a hard time. Harper asked if I'd be able to restart payments
101 soon, and I said that I'd do my best. Harper smiled and said, "Look, Bobbie, this can't go on
102 forever, but we're going to find a way to figure this out. Just don't worry." Harper definitely
103 didn't say anything about a July 1st deadline. Following Harper's visit, I remember feeling
104 reassured in a way I hadn't in months. I was having a tough time, but Harper and the bank seemed
105 to be looking out for me.

106 That was the last I heard from Harper until I was arrested. I definitely didn't see the letter shown
107 in Exhibit 4 until the state produced it in discovery in this case, and I wasn't aware that the bank
108 was going to begin foreclosure proceedings on August 15th if I didn't pay. After all, Harper had
109 made it sound like the bank was going to take care of me. Maybe the letter was in my mailbox, but
110 I don't check my mail that often – I try to do everything electronically – and I'm positive I didn't
111 see it until sometime in November or December.

112 Still, by August, I was starting to feel worse and worse about my mortgage situation. Harper had
113 shown me good faith, and I wanted somehow to return the favor. I tried to go and talk to Harper
114 on the 10th, but it wasn't until I got to the bank that I realized it was closed. I didn't like it, but,
115 eventually, I knew what I had to do: I would sell my car and get current on my mortgage payments,
116 even if I still didn't know how I was going to make the rest of them. I had held off on selling the
117 car because I really needed a way to get around – I live in what's known as a "food desert," and
118 it's a three-and-a-half-mile hike from my front door to the nearest grocery store (Thanks a lot,
119 Amazon!) – and I needed a car if I was going to get a new job – but I figured I was out of options.
120 I put an ad on Craigslist on the morning of August 11th, and, within an hour, I had a buyer for my
121 1996 Lincoln Town Car. Though my car was old, it was pretty special in its prime. I always took
122 really good care of it. I was able to get \$3,500 for it, which is bit more than double the bluebook
123 value. I don't remember the name or anything else about the person who came and bought it, other
124 than that he paid cash, small bills which was definitely annoying, and said he was a collector, was
125 in a hurry to buy and didn't try to negotiate. I took the license plates off the car, but I guess I forgot
126 to give him the title, but he didn't ask, and I had no way of contacting him. I don't have a copy of
127 the Craigslist ad, because I deleted it after I sold the car, and I don't think Craigslist keeps archives

128 of ads.

129 I was feeling pretty good at that point, so, later that day, I decided to head up to Cibola Casino
130 near Wayfare to see whether I could turn my \$3500 into a little more. I've been playing poker
131 since my music days, and, at the risk of sounding like I'm bragging, I'm really good. I didn't have
132 my car anymore, but Cibola Casino runs a free shuttle which stops in a few towns in Lincoln
133 County, including Lincoln. So, I took the shuttle there and arrived around 4:30. I remember
134 chatting with Dakota Prescott in the cage before I hit the floor, and I told Dakota that I had just
135 sold my car. I wasn't going to risk all my money, so I decided to only play with \$1,500. That's
136 way more than I usually would play with – I usually limit myself to a few hundred bucks at the
137 most – but, like I said, I was feeling good. I had a great night and walked away with something
138 like three or four grand over my initial buy in. I gave Dakota my chips and asked for my money
139 back in cash. Because of the amount I started with, the casino didn't have to give me any tax forms
140 for my winnings. I then took the shuttle home. Other than Dakota, the poker dealer, other players
141 at the table (none of whom I was familiar with) and the guy who bought my car, I didn't see or
142 talk with anyone else that day.

143 I had been planning on making my mortgage payment the next day, but, given how well I had done
144 at the casino, I was wondering whether I could make even more money at the poker table before
145 doing so. The next day, I sat around the house and worked a bit on the deck – I didn't see or talk
146 to anyone all day – and the next day, August 13th, I decided to take the shuttle back up to Cibola
147 Casino. I got there right when they opened at noon. That was a little unusual for me, but I was
148 unemployed, so it's not like I had anything else to do. I followed the same routine as before. My
149 buy in was \$1,500 in chips, did relatively well, and a few hours later decided to cash it in at about
150 \$3,000. I don't remember what I talked about with Dakota when I was trading in my chips, other
151 than mentioning something about needing to pay back the bank and asking that Dakota issue me a
152 check for \$5,212.14 that I could give to the bank. (That was the amount due on my mortgage,
153 which I had seen on my most recent mortgage statement.) I gave Dakota the extra cash that would
154 go into the check, got it printed, and left the casino at about 3:30 p.m. and headed home.

155 The next day, I walked down to the bank's Lincoln branch and gave Harper the check, which is
156 shown in Exhibit 2. Harper seemed really happy; they asked how I came up with the money, and
157 I told them about selling my car and getting lucky at the casino. I didn't think anything of it, other
158 than feeling good about getting current on my payments.

159 That afternoon, though, I received yet another shock; a Lincoln County Sheriff's Detective, whom
160 I now know to be Riley Rector, showed up at my door and started asking me a bunch of really
161 aggressive questions. I don't remember all the details, but I do remember the detective asking
162 about a stolen car that sounded like the one I had just sold. I told the detective that I had just sold
163 a dark blue car, not a light blue one, but the detective didn't seem to care. I told the detective that
164 I sold it to some guy on Craigslist, that I didn't know exactly who he was, and that I had been at
165 home alone on both Monday and Wednesday mornings. The detective was making me really
166 uncomfortable, so at that point, I asked the detective to tell me what was going on. I still remember
167 the detective's suspicious look and the way the detective said, "Not yet, but you'll find out." That
168 irritated me; it seemed like something someone would say in a true crime podcast. I shut the door
169 in the detective's face and went back to working on my deck.

170 Next thing I know, I'm in handcuffs. I had nothing to do with the two robberies. I didn't see the
171 headlines regarding the robberies until after the detective's visit. I got curious about what it might
172 be all about. I just hope I can clear my name.

173 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
174 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain
175 all relevant testimony, and I followed those instructions. I also understand that I can and must
176 update this affidavit if anything new occurs to me until the moment before I testify in this case.

177 Bobbie Gurule

178 Signature

Statement of Dakota Prescott

My name is Dakota Prescott. I'm 67 years old, and I live in Wayfare, New Mexico. I've bounced around quite a bit over the years. I grew up in the San Francisco Bay Area where my parents ran a bunch of national newspapers. I didn't want to live the corporate business life, so I was a bit of a rebel. I ended up running in a few different circles - mostly social clubs, a few bands, one or two secret societies, things like that. Ever heard of the Paranoids, the music group? I was their bassist for a while and for a few different bands, but eventually I got caught up in a bank fraud scheme for a secret society.

My parents were quite well-known in the Bay Area publishing scene. My father, Gerald Prescott, was the editor-in-chief of the San Francisco Chronicle for nearly two decades, and my mother, Eleanor, managed several smaller local papers. They had high expectations for me to follow in their footsteps, maybe attend Columbia or Northwestern for journalism, and eventually take over the family business. But I was drawn to the counterculture scene that was thriving in San Francisco during the late '60s and '70s.

I remember the day I told my father I was dropping out of UC Berkeley to join a band. He didn't speak to me for nearly six months. My mother tried to mediate, but there was this unbridgeable gap between my father's world of deadlines, editorial meetings, and corporate lunches, and my world of music, experimentation, and what I saw as authentic living. Looking back now, I can see that he was just concerned about my future, but at the time, it felt like he was trying to control me. In 1983, I was convicted following a trial of multiple counts of bank fraud. I served 5 years in prison and was released in 1988. That whole thing was a sobering experience, and I chose to clean up my life. I can't say I feel that concerned about the banks losing that money, but I did not want to return to prison life.

Anyway, after I got out, things were pretty tough. Especially back then, it was really hard for a recently convicted felon to find work, so I worked lots of odd jobs. I was a gardener, a delivery driver, a waiter, a painter, and a bunch of other odd jobs; can't remember them all. In 1997, I decided California was just getting too expensive, so I moved out to Wayfare from the Bay Area and told myself I needed to make a new start. That year, it turned out, was when Cibola Casino opened about 45 minutes outside of town. I started as a janitor that year. Since then, I worked my way up to the casino's assistant floor manager. They asked on the application whether I'd ever been convicted of any crimes, and, this time, I decided I'd simply write "no." I'd been honest about my conviction before, and the only thing it had gotten me was rejection letters. I figured I'd take a chance and see if the casino would follow up on it. As far as I know, they never did, and I got the job.

As the floor manager, I divide my time between the "cage" and the floor itself. The cage is the area where customers come to exchange their money for chips, which they can then use to play poker, blackjack, and many of our other games. It's a pretty routine job - the customer gives me the money; I count it and then give them the chips - but someone's got to do it. It was primarily in the cage that I met Bobbie, who's been a regular at the casino since, I don't know, maybe 2018? Since then, Bobbie has visited us about once a month. Bobbie has told me before that their game is poker, Texas Hold 'Em, to be precise, and from what I can tell, Bobbie is a really good player. A number

of times over the years, Bobbie has come to the cage with only \$50 or \$100 and then come back at the end of the night with \$2,000 or \$3,000 in chips. Of course, that doesn't happen every time; sometimes Bobbie more or less breaks even, and sometimes Bobbie loses money, but, overall, I'd say that Bobbie seems to win more money than Bobbie loses.

I've gotten to know many of our regulars over the years, and Bobbie stands out as one of the more skilled players. Poker is a game that rewards patience, observation, and psychological insight. It's not just about the cards you're dealt, but how you play them and how you read your opponents. Bobbie has what we in the business call "table presence," meaning a calm demeanor that doesn't give away much but also doesn't come across as suspiciously stone-faced. They're friendly enough to not alienate the other players but focused enough to maintain an edge.

What's particularly impressive about Bobbie's play is their consistency. Most poker players, even good ones, have significant ups and downs. They'll win big one night, then lose it all the next time they come in. Gambling addiction is a real problem in this industry. I've seen people destroy their lives chasing losses. But Bobbie seems to have a system and the discipline to stick to it. They set limits for themselves, walk away when they're ahead, and don't seem to get emotional about the game. That's rare.

August 11, 2025, was a busy night, and I was alternating between the cage and the floor. At about 4:30 p.m., which is earlier than Bobbie usually comes in, Bobbie showed up at the cage with a wad of cash in a paper bag. It was a lot more than Bobbie usually brings. I made a comment about Bobbie winning the lottery, but they told me that it was cash from selling an old car. I definitely counted the money, but to be honest, I can't remember exactly how much they gave me. It was somewhere between \$1,500 and \$2,000. I do remember, though, that it was mostly twenties and fifties along with a few fives. Bobbie seemed relaxed for the whole interaction; if you had told me that they had just robbed a bank, I'd be surprised. Bobbie was wearing blue jeans and a t-shirt. (I didn't see their shoes.) There were plenty of people there on the floor that night wearing dark hoodies; after all, it's a pretty good way to protect your poker face.

The casino floor that night was a typical mix of tourists and locals. We get a lot of people passing through on their way to or from Albuquerque or Santa Fe, especially in the summer months. August is actually one of our busier seasons. The poker tables were nearly full, and there was a wait list for some of the more popular games. As I mentioned, there were several people wearing hoodies that night. It's common attire in poker rooms across the country. Players like to create their own little zone of privacy, and a hoodie pulled low over the eyes helps with that. It also keeps you warm, as we keep the casino pretty cool to counteract all the body heat from the crowds and the heat from the machines.

Bobbie grabbed the chips and headed straight to the poker table. I didn't see them again until later in the evening, when they came back to cash in their chips. Bobbie's win added up to over \$3,000. Without giving it much thought, I said something like "Good going, my friend! Looks like you won some." Bobbie still seemed relaxed; the whole evening had been perfectly ordinary, as far as I was concerned. I asked how to pay out the winnings and gave Bobbie the cash as requested. It was mostly in fifties. I saw Bobbie again on August 13th. I remember that day a little more clearly because Bobbie came in at about 12:15 p.m., right after we opened. Bobbie was the first person up at the cage, again with a paper bag full of cash. I was a bit taken aback, only because Bobbie had

84 just been in the previous Monday and, as far as I can remember, had never come in that early or
85 regularly. Apparently, it was Bobbie's day off, and they were still feeling lucky. I counted the cash,
86 but, again, I don't remember exactly how much Bobbie gave me - only that it was somewhere
87 between about \$4,000 and \$5,000 and that it was mostly in twenties and fifties, with a few fives
88 thrown in for good measure. It was odd that Bobbie had more cash. I remember asking if they had
89 sold another car. Bobbie chuckled and said, "This is just the rest of what I got for the first one."
90 Same as on the 11th, there were a few people who came in later in the afternoon wearing dark
91 hoodies. From what I remember, Bobbie was dressed similarly to the previous visit, jeans, t-shirt,
92 but this time Bobbie was also wearing a hoodie, a dark hoodie I believe.

93 Wednesday afternoons are typically slow at the casino. Most of our regulars are at work, and the
94 tourists tend to come in later in the day. So when Bobbie showed up right after opening, they had
95 their pick of tables. I remember thinking it was unusual to see them twice in three days, especially
96 at such different times. Most of our regulars have pretty consistent patterns. They come in on the
97 same days, at roughly the same times. Changes in those patterns sometimes indicate changes in
98 their personal circumstances - a new job, retirement, or occasionally, financial troubles that have
99 them gambling more frequently in hopes of a big win.

100 But Bobbie didn't seem desperate or anxious, which is what we're trained to watch for as potential
101 signs of problem gambling. They were calm, friendly, and seemed to be treating the visit as
102 recreation rather than a financial necessity. The hoodie didn't strike me as suspicious either. The
103 casino can get chilly, especially in the morning before it fills up with people.

104 When I asked about the additional cash and Bobbie said it was the rest from the car sale, that made
105 sense to me. People often don't carry all their cash at once, especially larger amounts. And if
106 Bobbie had done well on Monday, it was natural they might want to try their luck again while they
107 were on a hot streak.

108 An hour or two later, they came back with their chips, which I counted, and which amounted to
109 something just under \$5,000. I don't remember precisely. When I said something about how selling
110 the car had started a pretty good run of luck, Bobbie said something about losing a job and getting
111 hassled by the bank for getting behind on mortgage payments. I remember that Bobbie looked
112 really stressed and said, "The car was the last thing I had, so I really need to pay the bank. If I give
113 you the rest in cash, can you make out a check to Conchas Savings Bank for \$5,212.14?" So, I did
114 that. The rest of the cash was mostly in fifties, like what I gave Bobbie the Monday before. As on
115 Monday, Bobbie seemed relaxed for our entire interaction.

116 That request for a check made directly to the bank stood out to me. Most players take their
117 winnings in cash or have checks made out to themselves. But it's not unheard of for people to
118 request checks to specific creditors. I've made out checks to landlords, car dealerships, and yes,
119 banks before. It's actually a service some players appreciate, as it helps them make sure their
120 winnings go toward important expenses rather than being tempted to gamble more.

121 Later on, I read about the bank robberies in the Rye Reporter, but if you ask me, I don't think
122 Bobbie is the one who did them. Bobbie seemed totally calm on both nights; I mean, how would
123 you be if you had just robbed a bank? If anybody's robbing anybody, it's the bankers themselves.
124 I've had a mortgage with that same bank since 2004, and I can't believe how high my monthly

125 payments are. The way I see it, it's them who've been robbing me for 20 years.

126 When I first read about the robberies, I didn't even make a connection to Bobbie. It wasn't until a
127 detective came to the casino asking questions about Bobbie's visits that I realized they were a
128 suspect. I was genuinely shocked. In all the years I've known Bobbie, they've never struck me as
129 the criminal type. They're quiet, polite, keep to themselves at the poker table but aren't antisocial.
130 They tip appropriately, not extravagantly, but fairly. That might seem like a small thing, but in my
131 experience, it says something about a person's character.

132 The detective asked me if Bobbie had seemed nervous or if there was anything unusual about their
133 behavior on either visit. I told them exactly what I've stated here - that Bobbie was completely
134 normal, perhaps even more relaxed than usual on the 11th. The detective seemed particularly
135 interested in the paper bags and the denominations of the bills, but honestly, there was nothing
136 suspicious about it either. We get people bringing cash in all sorts of containers -- envelopes,
137 wallets, money clips, rubber bands, and yes, paper bags. And twenties and fifties are the most
138 common bills we see.

139 In my years at the casino, I've developed a pretty good sense for reading people. It comes with the
140 territory. And everything about Bobbie's demeanor on both August 11th and 13th was consistent
141 with someone who was simply enjoying some gambling with money from a car sale, not someone
142 who had just committed armed robbery.

143 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
144 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain
145 all relevant testimony, and I followed those instructions. I also understand that I can and must
146 update this affidavit if anything new occurs to me until the moment before I testify in this case.

147 Dakota Prescott

148 Signature

Statement of Drew Armenta

My name is Drew Armenta. I live in Rye, New Mexico. I'm 40 years old, and I work as a private investigator. I was hired by Bobbie Gurule's defense team to conduct an investigation into the bank robberies that took place on August 11th and August 13th. I charge \$110 per hour for investigative time, \$250 per hour for testimony, plus my costs. After reviewing the work done by the Lincoln County Sheriff's Office, I concluded that the investigation was inadequate, and that Bobbie Gurule did not commit these robberies.

I've been a licensed private investigator in New Mexico for over fifteen years now, and I've worked on hundreds of cases ranging from simple background checks to complex criminal defense investigations. My specialty has always been technology-related investigations, particularly those involving digital evidence, GPS tracking, and location data. In this increasingly digital world, understanding the technical aspects of evidence has become crucial to ensuring fair trials and proper defense.

I grew up in Rye and attended New Mexico Highlands University, where I majored in criminal justice. When I graduated in 2005, tech companies were hiring everyone they could who knew anything about computer science. My mom always said that taking a coding class would be job security; turned out she was right. I started my career as a designer at GPS Maps in 2006. I primarily was responsible for the look and "feel" of the site. After a couple of years, I was laid off, but, honestly, it turned out to be a blessing in disguise. I was able to return to my criminal justice roots. I opened my own investigative agency in 2008 with special expertise on GPS and location technology. Though I accept almost every client, I'm frequently hired by criminal defense lawyers. The cops and prosecutors like to use their own experts, but I have found that they do not fully understand GPS and location technology. In almost every criminal trial I have testified in, law enforcement has been quick to draw conclusions on insufficient GPS or location data. The juries tend to listen to them, though, and I blame the true crime podcast fad.

My time at GPS Maps was formative for my later career, even though it only lasted about two years. The company was developing one of the early smartphone navigation applications, competing with the likes of TomTom and Garmin as GPS technology was becoming mainstream in consumer devices. My role started in UI/UX design, but I quickly became fascinated with the underlying technology -- how satellites could pinpoint a user's location, how that data was transmitted and stored, and the limitations of the technology.

When the 2008 recession hit, GPS Maps laid off about 40% of its staff, including me. At first, I was devastated. I had student loans to pay off and was just getting established in my career. But within a few weeks, I realized this could be an opportunity. The criminal justice degree I'd worked so hard for was gathering dust, and I had always been interested in investigation work. Now I had technical knowledge that most investigators lacked.

I started small, working out of my apartment with just a laptop and a cell phone. My first clients were local attorneys who needed help understanding digital evidence in their cases. One early case involved a man accused of violating a restraining order based on cell tower data supposedly showing that his phone had pinged towers near his ex-wife's home. I was able to demonstrate that the data was being misinterpreted and that the cell towers in question covered a much wider area

that included the defendant's workplace. The case was dismissed, and word of my expertise began to spread in the legal community.

Over the years, I've taken a number of continuing education courses at Rye Community College on GPS and location technology, which comes up in my work more often than you might realize. I also have a certification in GPS and location technology from the Defense Institute of Continuing Education, which I obtained in 2021. I've worked on dozens of cases and have previously testified as an expert witness in both state and federal courts on GPS and location technology (among many other subjects). I've always testified for the defense.

The certification from the Defense Institute was particularly challenging to obtain. It's an intensive program designed for military and intelligence professionals who work with location tracking systems. As a civilian, I had to apply for special permission to attend, and the application process included extensive background checks and references. The course itself was a three-week immersive program covering everything from the physics of GPS satellite systems to the latest in cellular triangulation technology and the legal frameworks governing location data collection.

What many people don't understand about location data is just how complex and nuanced it can be. There's a tendency, especially among law enforcement and prosecutors, to treat it as infallible: "The GPS says the suspect was there, case closed." But the reality is far more complicated. Depending on the technology used, location data can have margins of error ranging from a few feet to several hundred yards. Environmental factors, building materials, and even weather conditions can affect accuracy. And that's before we even get into questions of who had possession of the device, whether the data could have been manipulated, or if the collection methods were legally sound.

Bobbie Gurule's attorneys showed me the affidavit of Taylor Lightman, who I understand to be a computer forensic specialist with the Lincoln County Sheriff's Office, and asked me to comment on Lightman's conclusions. I cannot question Lightman's general mode of analysis, but I don't agree with the ultimate conclusion that the robber's car must have exited the freeway at Bow Canyon. I haven't actually been to the location where the tracking device was found. Based on Lightman's description, it is equally possible that the device could have been thrown from the freeway (due to the blip of the device being tracked after the exit) or dropped out of the window from the exit ramp. There are too many variables to rule out either option without extensive testing, and even then, determining the strength of the wind, the strength of the thrower, the speed of the car and so forth would be nearly impossible. Tempest's conclusion is nothing more than conjecture.

The way I see it, because the tracking data on which the government relied doesn't tell us very much -- including, most importantly, where Bobbie was at the time of the robberies -- I decided that I needed more information. So, I asked Bobbie if they had a cellphone. Bobbie told me that they had an Android device, which is great. Anyone with an Android device is automatically connected to a Google account. Depending upon the privacy settings you have setup on your phone, Google can and will collect location information on your device anytime you access a Google service. Sometimes it will collect location information even if you're not explicitly using a Google App, meaning it will collect that information in the background of your device. The location data can really help move an investigation forward if you know where to look. I remember one case years ago where my investigation for the defense not only cleared the name of the

84 accused, but also helped the police find and arrest the true culprit.

85 That case I mentioned was particularly memorable. It involved a convenience store robbery in Las
86 Cruces where my client, a college student, had been identified by an eyewitness as the perpetrator.
87 The identification seemed solid; the witness was certain, and my client roughly matched the
88 physical description. But my client insisted he was at his girlfriend's apartment across town at the
89 time of the robbery.

90 When I examined his Google location data, it confirmed his alibi, showing his phone at the
91 girlfriend's address during the robbery. But what made the case unusual was that the location data
92 also showed something unexpected; his phone had been near the convenience store earlier that
93 same day, when he'd stopped to buy gas. This explained why the witness might have confused him
94 with the actual robber.

95 When it comes to location data, though, it's important to know that the technology is generally
96 very reliable, but not foolproof. The location data we get from Google tells us only that the user's
97 device sent information to Google at a particular time and from a particular location, but not that
98 the device's user actually was present at that location at that time. "Virtual private networks," for
99 example, can mask a user's real location by hiding the user's real IP address (from which a user's
100 location is sometimes determined). That said, I inspected Bobbie's phone and did not find any
101 software that would hide Bobbie's location.

102 Google's location services work through a combination of GPS, Wi-Fi networks, Bluetooth
103 beacons, and cell tower data. When these systems work together, they can pinpoint a device's
104 location with remarkable accuracy, often within a few meters in optimal conditions. But each
105 system has its limitations. GPS requires a clear line of sight to satellites and doesn't work well
106 indoors. Wi-Fi and Bluetooth positioning depend on the density and accuracy of reference points
107 in Google's database. Cell tower triangulation can be quite imprecise in rural areas with fewer
108 towers.

109 I checked the phone's location history settings. Bobbie's account was set to save location history,
110 which is significant because users who are deliberately trying to hide their movements often
111 disable this feature. The continuous timeline of location data on the device showed normal patterns
112 of movement consistent with Bobbie's described daily activities, with no suspicious gaps that
113 might indicate deliberate deactivation during certain periods.

114 Now, I understand that Taylor Lightman sent a search warrant to Google directing it to provide
115 information on any Google accounts associated with devices that, according to any saved location
116 data, were present at the times and locations of both robberies, which avoided the collection of
117 information of a huge number of innocent people, but they got no results. That, I think, is an
118 indication that Bobbie is not the robber, because Bobbie told me that they always carry their phone.
119 But I didn't want to stop there; I wanted to see if I could prove Bobbie was somewhere else at the
120 time of the robberies.

121 The follow-up for most detectives, me included, is to then check the location of the suspect or, in
122 my case, accused individual. I wanted to see if Google could tell us where Bobbie Gurule actually
123 was at the time of the robberies. Bobbie told me that their email address was

124 "bgurule3@gmail.com," and that their password was "gurule1934." Bobbie actually had to check
125 a password manager to find the password because they change it all the time for security reasons.

126 Anyway, using that information, I accessed Bobbie's Google account. Because of a couple of new
127 data protection laws, Google now is required to allow users to access and download all their
128 personal information. I downloaded the data and reviewed Bobbie's location information from the
129 mornings of August 10, 11, 13, and 14, 2025. (I included a day before the first robbery and a day
130 after the second robbery just for context.)

131 I then filtered the data such that it included only information related to the immediate surroundings
132 (a few blocks) of the two robbery locations. There was a lot of other location data showing Bobbie
133 elsewhere, like at the Cibola Casino, but since it was not relevant to the case, I didn't bother
134 analyzing any of that information. I was just focused on any location data near the robberies around
135 the time of the robberies. That information provided sufficient facts and data for me to form an
136 opinion concerning Bobbie's whereabouts around the time of each robbery. My evaluation in that
137 regard was based on reliable principles and methods applicable to virtually all types of location
138 data analysis, all of which I have applied reliably in this case.

139 The process of downloading and analyzing Google location data is more complex than most people
140 realize. Google provides this information through their "Takeout" service, which compiles all
141 requested data into downloadable archives. For location history, this typically comes in the form
142 of JSON files containing timestamped latitude and longitude coordinates, along with accuracy
143 estimates and activity indicators.

144 I began by considering the Stash Junction robbery. That part of my analysis was straightforward:
145 None of the location data I reviewed showed Bobbie near Conchas Savings Bank's Stash Junction
146 branch around the time of the robbery on August 13th. In fact, none of the data suggested that
147 Bobbie had been anywhere in Stash Junction on any of the four days I examined.

148 The Lincoln robbery was a slightly different story, although in the end it showed the same thing. I
149 examined the data, and none of it showed Bobbie at the site of the robbery in Lincoln on August
150 11th, either. There was, however, location data showing Bobbie in other parts of the Lincoln area
151 on each of the four days I considered. I plotted those points on a map, which is shown in Exhibit
152 5. It's theoretically possible that Bobbie could have turned off their phone or the phone's "location
153 services" function; it's also possible that Bobbie simply did not connect to any Google services at
154 the time of the robberies. In any of those cases, Bobbie's location data wouldn't track their actual
155 movements.

156 While it's true that Bobbie could theoretically have left their phone at the Lincoln Perk coffee shop
157 while committing the robbery, this scenario seems highly implausible. First, it would require
158 premeditation and a level of technical sophistication that doesn't align with Bobbie's profile.
159 Second, leaving a phone unattended in a public place creates a significant risk of theft or discovery.
160 Third, the activity logs show regular interaction with the device throughout the time period,
161 suggesting Bobbie was actively using their phone while at the coffee shop.

162 But, in my opinion, the location data we have makes it unlikely that Bobbie is the robber. First,
163 Google tracked Bobbie's location when they were at the Lincoln branch on August 10th and 14th

164 and also tracked certain of their other movements, so I can say with certainty that Bobbie does
165 allow location tracking on their device, at least sometimes. Further, I know that Google makes it
166 very, very difficult to manage your privacy settings, especially when it comes to third-party apps.
167 I have read many peer-reviewed studies showing that, over the years, Google can continue to track
168 your location even if you think you have turned off certain location settings. Bobbie seems to
169 always be glued to their phone, like most people these days, and they did not seem concerned about
170 the security settings.

171 Based on my thorough analysis of the available location data and the technical configuration of
172 Bobbie's device, I believe the evidence strongly suggests that Bobbie Gurule was not present at
173 either robbery location during the times the crimes were committed. While no digital evidence can
174 provide absolute certainty, the consistent patterns of location data, the absence of sophisticated
175 privacy measures, and the corroboration of Bobbie's stated activities all point to their innocence in
176 these matters.

177 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
178 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain
179 all relevant testimony, and I followed those instructions. I also understand that I can and must
180 update this affidavit if anything new occurs to me until the moment before I testify in this case.

181 Drew Armenta

182 Signature

Exhibit List

Exhibit 1: Map showing where the GPS device from Conchas Bank was found

Exhibit 2: Check from Cibola Casino to Conchas Savings Bank

Exhibit 3: Title of 1996 Lincoln Sedan

Exhibit 4: Mortgage Foreclosure Letter

Exhibit 5: Bobbie Gurule's Google Location Information

Exhibit 6: Cibola Casino Cage Transaction for Bobbie Gurule

Exhibit 7: Copy of Conchas Savings Bank Employee Training Manual

Exhibit 8: Craigslist Search Report

Exhibit 1

Map showing where the GPS device from Conchas Bank was found



Exhibit 2
Check from Cibola Casino to Conchas Savings Bank

<p>CIBOLA CASINO, LLC 1234 HIGHWAY 91 WAYFARE, NM 88338</p>	<p>CHECK NO. 11893</p> <p>DATE AUGUST 13, 2025</p>
<p>PAY TO THE ORDER OF CONCHAS SAVINGS BANK</p>	<p style="text-align: right;">\$ 5212.14</p>
<p>FIVE THOUSAND TWO HUNDRED TWELVE DOLLARS AND 14/100 DOLLARS </p>	
<p>MEMO MORTGAGE</p>	<p style="text-align: right;"><i>Dakota Prescott</i></p>
<p>164752013: 12876529806 000000</p>	

Exhibit 3
Title of 1996 Lincoln Sedan

	TITLE NO: NM-25-789456										
STATE OF NEW MEXICO MOTOR VEHICLE DIVISION CERTIFICATE OF TITLE											
<div style="border: 1px solid black; padding: 5px;">VEHICLE INFORMATION<table style="width: 100%;"><tr><td style="width: 50%;">YEAR 1996</td><td style="width: 50%;">MAKE LINCOLN</td></tr><tr><td>MODEL TWNCR</td><td>BODY TYPE SEDAN</td></tr><tr><td>VEHICLE IDENTIFICATION NUMBER 1LNLM81W4TY625413</td><td>COLOR BLUE</td></tr><tr><td>LICENSE PLATE NUMBER 351 VGN</td><td>ODOMETER READING 78,245 MILES</td></tr><tr><td>ODOMETER BRAND ACTUAL</td><td></td></tr></table></div>		YEAR 1996	MAKE LINCOLN	MODEL TWNCR	BODY TYPE SEDAN	VEHICLE IDENTIFICATION NUMBER 1LNLM81W4TY625413	COLOR BLUE	LICENSE PLATE NUMBER 351 VGN	ODOMETER READING 78,245 MILES	ODOMETER BRAND ACTUAL	
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ODOMETER BRAND ACTUAL											
<div style="border: 1px solid black; padding: 5px;">OWNER INFORMATION OWNER NAME AND ADDRESS BOBBIE GURULE 272 PARK STREET LINCOLN, NM 88338</div>											
<div style="border: 1px solid black; padding: 5px;">LIENHOLDER INFORMATION FIRST LIENHOLDER NAME AND ADDRESS NONE</div>											
<div style="border: 1px solid black; padding: 5px;">TITLE INFORMATION<table style="width: 100%;"><tr><td style="width: 50%;">ISSUE DATE 03/09/2002</td><td style="width: 50%;">TITLE TYPE ORIGINAL</td></tr></table></div>		ISSUE DATE 03/09/2002	TITLE TYPE ORIGINAL								
ISSUE DATE 03/09/2002	TITLE TYPE ORIGINAL										
<div style="display: flex; justify-content: space-between; margin-top: 20px;"><div style="width: 45%; border-top: 1px solid black; text-align: center;">AUTHORIZED SIGNATURE</div><div style="width: 45%; border-top: 1px solid black; text-align: center;">DIRECTOR, MOTOR VEHICLE DIVISION</div></div> <p style="font-size: small; margin-top: 10px;">TAXATION AND REVENUE DEPARTMENT - MOTOR VEHICLE DIVISION P.O. BOX 1028, SANTA FE, NM 87504-1028</p>											

Exhibit 4
Mortgage Foreclosure Letter to Bobbie Gurule



Conchas Savings Bank

Serving your needs since 1933

3828 Piermont Drive NE
Lincoln, NM 88338
(575) 653-4370

July 26, 2025

Bobbie Gurule
272 Park Street
Lincoln, NM 88388

Dear Bobbie,

I am writing regarding your mortgage with Conchas Savings Bank. As we have discussed, we have not received any payment from you since February of this year. Your current outstanding balance, including all applicable late fees, is \$5,212.14.

Regrettably, if we do not receive payment in full by August 15, 2025, we will have no choice but to initiate foreclosure proceedings the following day.

If there is any way in which we might assist you in paying down your balance, please let us know as soon as possible. On behalf of all of us at Conchas Savings Bank, I wish you all the best.

Sincerely,

Harper Van Zandt

Harper Van Zandt
Manager, Conchas Savings Bank

Exhibit 5
Bobbie Gurule's Google Location Information

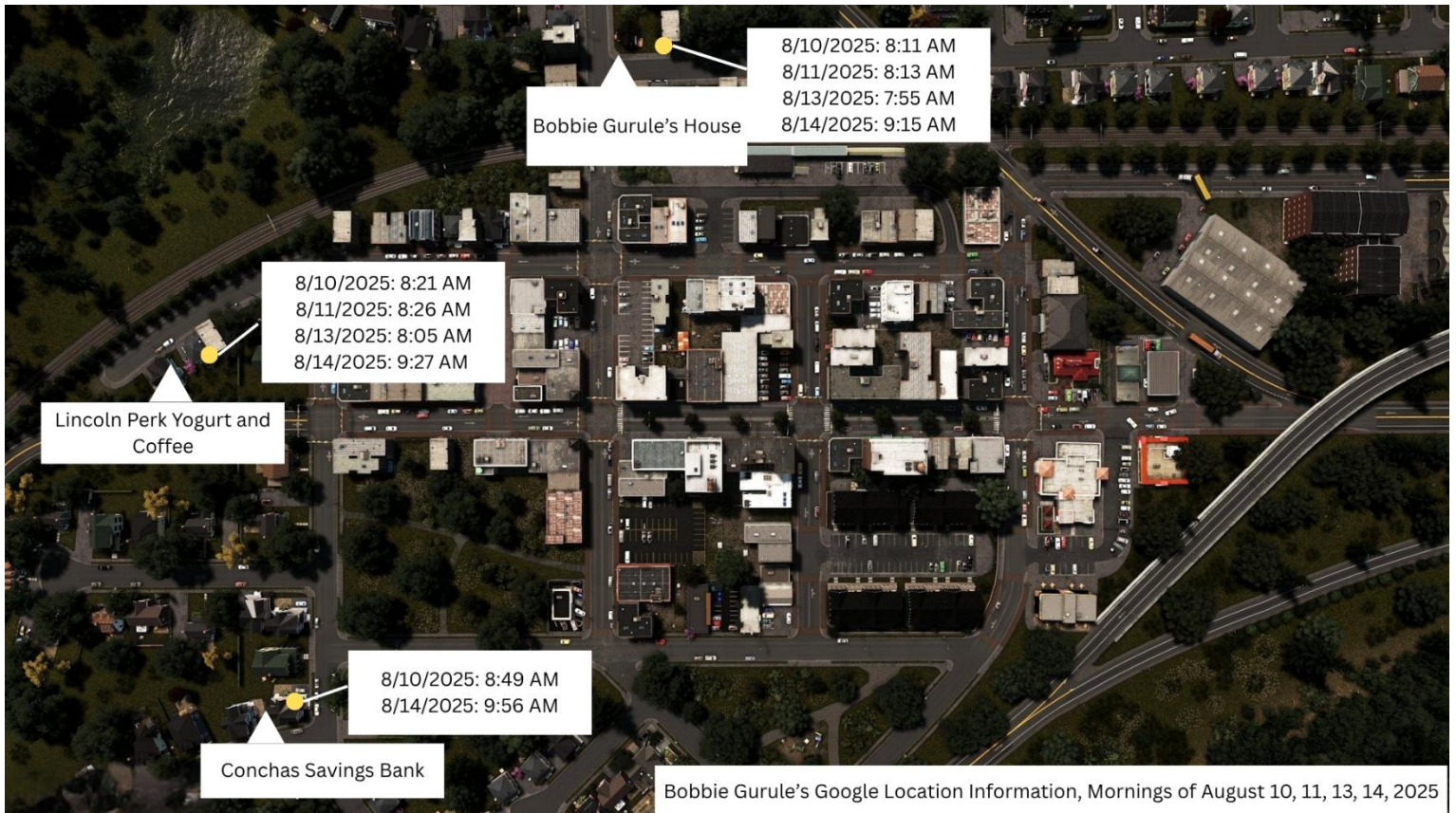


Exhibit 6
Cibola Casino Transaction Log for Bobbie Gurule



CIBOLA CASINO CAGE TRANSACTIONS

CIBOLA CASINO CAGE TRANSACTION LOG SUMMARY EXTRACT

Date	Time	Player Name	Activity	Amount	Method
8/11/25	4:32 PM	Bobbie Gurule	Cash Chips	\$1,750	Cash (mixed \$20s/\$50s)
8/11/25	10:48 PM	Bobbie Gurule	Chips Cash	\$4,980	Cash (primarily \$50s)
8/13/25	12:17 PM	Bobbie Gurule	Cash Chips	\$1,500	Cash (mixed bills)
8/13/25	3:14 PM	Bobbie Gurule	Chips Check	\$5,212.14	Check #11893 to Conchas Savings Bank

Exhibit 7
Excerpt from the Conchas Savings Bank Training Manual

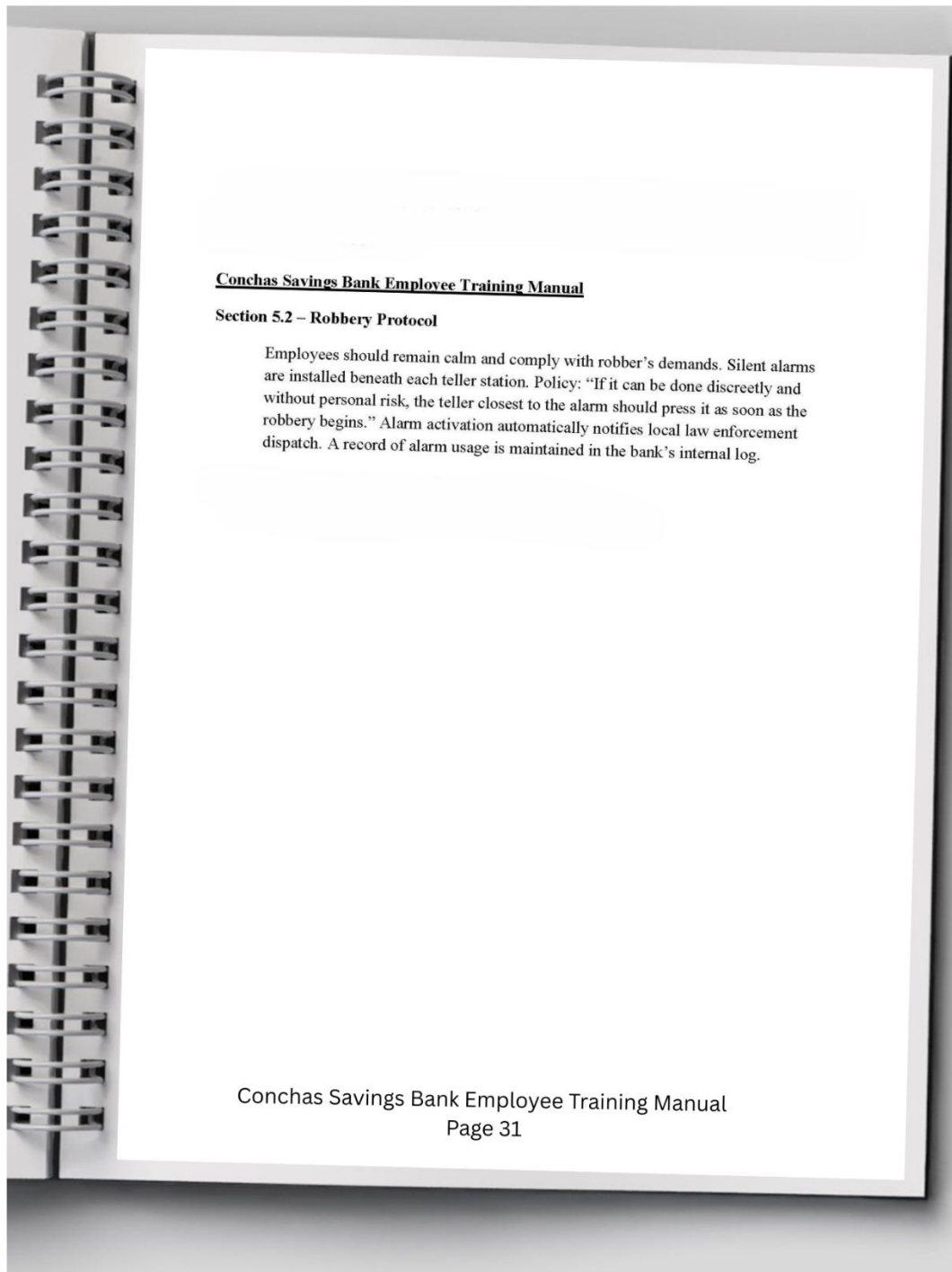


Exhibit 8
Craigslist Search Report



Results:

- Listing 1: 1996 Lincoln Town Car, White, 122k miles, \$2,900. Posted August 6, 2025.



- Listing 2: 1996 Lincoln Town Car, Tan, 138k miles, \$3,200. Posted August 9, 2025.



- Listing 3: 1996 Lincoln Town Car, Blue, 149k miles, \$2,500. Posted August 11, 2025.



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