

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

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Civil action No. 97-D-1036

Cause of Action Date:

5 May 1997

Steve Douglas, Gartin  
Plaintiff

Lower Court Cases:

96C07019 Inc.

96C07386

96C07387

96C07388

97M0811

97M0812

97M472

55239GoldenMunicipal

v.

Charles T. Hoppin ]  
Ronald L. Miller ]  
James Demlow ]  
Roy Olsen ]  
Henry Nieto ]  
Marilyn E. Leonard ]  
Dorothy Cline ]  
Judith Cherne ]  
Antonio Troy Ciccarelli ]  
J. Terry Wiggins ]  
Alan Karsh ]  
Larry Fulton ]  
Seymour Joseph ]  
Fred Gabler ]  
William Hayashi ]  
Maurice Knaizer ]  
Lynda Donnelly ]  
James Hollaway ]  
Elizabeth Kiovsky ]  
George Brauchler ]  
David J. Thomas ]  
Ted Maclinberg (sic) ]  
James Peters ]  
Darren Voss ]  
Gale Norton ]  
William Pharo ]  
Jefferson County Sheriff ]  
Arapahoe County Sheriff ]  
City of Golden ]  
City of Littleton ]  
Golden Community Center, Inc. ]  
City of Aurora ]  
City of Greenwood Village ]  
U S West, Inc. ]  
Lutheran Church, M.S. ]  
Bethlehem Lutheran, Inc. ]  
Office Space Saving Concepts, Inc. ]  
STATE OF COLORADO ]  
Spyderco, Inc. ]  
Jefferson County Board of Commissioners ]

Arapahoe County Board of Commissioners	]
Karsh & Fulton, P.C.	]
TAMARA A. GARTIN	]
Robert V. Zehnder Estate	]
Dolores J. Zehnder	]
Michael Zehnder	]
Timothy Zehnder	]
Francisca Zehnder	]
Markus B. Merritt	]
David Langewisch	]
Peter Woodward	]
Chet Shoaf	]
Richard McCormick	]
Daniel Manson	]
Ernest L. Laseter	]
Bill Stevens	]
Rich Waugh	]
Mike Bestor	]
Roy Romer	]
Ronald Beckham	]
Donald Estep	]
James D. Johnson	]
Grant Whitus	]
Deputy Martin	]
Dennis Beery	]
Allen L. Simmons	]
Lieutenant Manwaring	]
Sgt. Williams	]
Kirk G. Beaulieu	]
Barry L. Williams	]
Raymond Fleer	]
Joseph McGuire	]
Frank Lastoczy	]
Jack Jackala	]
Sgt. Walcher	]
Lt. Shrader	]
Randall West	]
Daryl Hoffman	]
Mark Nazaryk	]
A.J. DeAndrea	]
Michael Moler	]
Bill Killpatrick	]
Russell Cook	]
Dave Farley	]
Robert Tortora	]
Glenn Moore	]
Lewis Shellenberger	]
Ted Schnack	]
Mike Hendershot	]
Mark Stadterman	]
John Carr	]

Jeff Mulqueen	]	
Bruce Davis		]
Ewan Scouse		]
David Fisher		]
Steven Crowell	]	
Michael Harris	]	
Susan Hines		]
Mary Sutton		]
Pete Page	]	
Patrick Sullivan		]
W.H. Fields		]
Vincent Landis	]	
Ethan Feldman		]
Robert L. Allen	]	
Chief of Police	]	
Steve Zotos		]
Robert Wood		]
Robert McMahon	]	
Kim Castellano	]	
Corporal Reese	]	

Defendants

Trial By Jury Demand Herein

Complaint of Civil Rights Violations pursuant to Title 42 §§1986,  
1985, 1983  
Criminal Complaint pursuant to Title 18 §§ 241, 242, 872, 1001,  
1621 & 1622

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Comes now the Plaintiff, Steve Douglas, Gartin who is of proper age, of sound mind, tells the truth and has first hand knowledge of events and actions contained herein, without an attorney and in full possession of all inalienable rights and states:

PARTIES:

18<sup>th</sup> Judicial District  
100 Jefferson County Parkway  
Golden, Colorado 80401

Charles T. Hoppin  
At all pertinent times herein, Defendant, Charles T. Hoppin, was employed as a Sworn Judicial Officer with the Jefferson County District Courts. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Charles T. Hoppin was operating under color of law within the scope of his employment.

Golden Municipal Court  
911 10th Street  
Golden, Colorado 80401

Ronald L. Miller  
At all pertinent times herein, Defendant, Ronald L. Miller, was employed as a Sworn Judicial Officer with the Golden Municipal Court. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages.. At all pertinent times herein, Ronald L. Miller, was operating under color of law within the scope of his employment.

18<sup>th</sup> Judicial District  
100 Jefferson County Parkway  
Golden, Colorado 80401

James Demlow  
At all pertinent times herein, Defendant, James C. Demlow, was employed as a Sworn Judicial Officer with the 18<sup>th</sup> Judicial District. Defendant had knowledge that the deprivations were in progress,

conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, James C. Demlow was operating under color of law within the scope of his employment.

Roy Olsen  
At all pertinent times herein, Defendant, Roy Olsen, was employed as a Sworn Judicial Officer with the 18<sup>th</sup> Judicial District. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Roy Olsen was operating under color of law within the scope of his employment.

Henry Nieto  
At all pertinent times herein, Defendant, Henry Nieto, was employed as a Sworn Judicial Officer with the 18<sup>th</sup> Judicial District. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Henry Nieto was operating under color of law within the scope of his employment.

Marilyn E. Leonard  
At all pertinent times herein, Defendant, Marilyn Leonard, was employed as a Sworn Judicial Officer with the 18<sup>th</sup> Judicial District. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of

Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Marilyn Leonard was operating under color of law within the scope of her employment.

Dorothy Cline

At all pertinent times herein, Defendant, Dorothy Cline, was employed as a court clerk for the 18<sup>th</sup> Judicial District. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Dorothy Cline was operating within the scope of her employment.

Golden Municipal Court  
911 10th Street  
Golden, Colorado 80401

Ronald L. Miller

At all pertinent times herein, Defendant, Ronald L. Miller, was employed as a Sworn Judicial Officer with the Golden Municipal Court. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ronald L. Miller was operating under color of law within the scope of his employment.

Karsh & Fulton, P.C.  
Cherry Tower Office Building- Suite 710  
950 South Cherry Street  
Denver, Colorado 80222-2665

Antonio Troy Ciccarelli

At all pertinent times herein, Defendant, Antonio Troy Ciccarelli, was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant

had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Antonio Troy Ciccarelli was operating under color of law within the scope of his employment.

J. Terry Wiggins

At all pertinent times herein, Defendant, J. Terry Wiggins, was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, J. Terry Wiggins was operating under color of law within the scope of his employment.

Alan Karsh

At all pertinent times herein, Defendant, Alan Karsh, was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Alan Karsh was operating under color of law within the scope of his employment.

Larry Fulton

At all pertinent times herein, Defendant, Larry Fulton, was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff

grievous damages. At all pertinent times herein, Larry Fulton was operating under color of law within the scope of his employment

Seymour Joseph

At all pertinent times herein, Defendant, Seymour Joseph, was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Seymour Joseph was operating under color of law within the scope of his employment.

Fred Alexander Gabler Jr.

At all pertinent times herein, Defendant, Fred Alexander Gabler Jr. was employed as an Attorney at Law with Karsh & Fulton, P.C. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Fred Alexander Gabler Jr. was operating under color of law within the scope of his employment.

City Attorneys Office  
City of Golden, Incorporated  
911 10th Street  
Golden, Colorado 80401

William Hayashi

At all pertinent times herein, Defendant, William Hayashi, was employed as City Attorney of Golden, Colorado. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff

grievous damages. At all pertinent times herein, William Hayashi was operating under color of law within the scope of his employment.

Office of the Attorney General  
(Colorado)  
1525 Sherman St.  
Denver, Colorado 80203

Maurice Knaizer

At all pertinent times herein, Defendant, Maurice Knaizer, was employed as an Attorney at Law with the Colorado State Attorney Generals' Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Maurice Knaizer was operating under color of law within the scope of his employment.

Colorado Supreme Court Grievance  
Committee  
600 Seventeenth Street  
Suite 510  
Denver, Colorado 80202-5435

Lynda Donnelly

At all pertinent times herein, Defendant, Lynda Donnelly, was employed as an Attorney at Law with the Colorado State Supreme Court Grievance Committee. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Lynda Donnelly was operating under color of law within the scope of her employment.

James Hollaway

At all pertinent times herein, Defendant, James Hollaway, was employed as an Attorney at Law with the Colorado State Supreme Court Grievance Committee. Defendant had

knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, James Hollaway was operating under color of law within the scope of his employment.

U S West, Incorporated  
7800 East Orchard Road- Suite 190  
Post Office Box 6508  
Englewood, Colorado 80155-6508

Elizabeth Kiovsky.  
At all pertinent times herein, Defendant, Elizabeth I. Kiovsky, was employed as Senior Attorney at Law with the U S West, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Elizabeth I. Kiovsky was operating under color of law within the scope of her employment.

18<sup>th</sup> Judicial District. Attorneys'  
Office  
500 Jefferson County Parkway  
Golden, Colorado 80401-6020

George Brauchler.  
At all pertinent times herein, Defendant, George Brauchler, was employed as Deputy District Attorney with the Jefferson County District Attorneys Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, George Brauchler was operating under color of law within the scope of his employment.

David J. Thomas  
At all pertinent times herein, Defendant, David J. Thomas, was employed as Jefferson County District Attorney, Jefferson County District Attorneys Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, David J. Thomas, was operating under color of law within the scope of his employment.

Ted Maclinberg (sic).  
At all pertinent times herein, Defendant, Ted Maclinberg (sic) was employed as Jefferson County Deputy District Attorney, Jefferson County District Attorneys Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ted Maclinberg (sic) was operating under color of law within the scope of his employment.

Arapahoe County District Attorneys  
Office  
7305 South Potomac  
Englewood, Colorado

James Peters.  
At all pertinent times herein, Defendant, James Peters was employed as Arapahoe County Deputy District Attorney, Arapahoe County District Attorneys Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, James Peters was operating under color of law within

the scope of his employment.

Darren Voss.

At all pertinent times herein, Defendant, Darren Voss was employed as Arapahoe County Deputy District Attorney, Arapahoe County District Attorneys Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Darren Voss was operating under color of law within the scope of his employment.

Office of the Attorney General  
(Colorado)  
1525 Sherman St.  
Denver, Colorado 80203  
Gale Norton

At all pertinent times herein, Defendant, Gale Norton, was employed as an Attorney at Law with the Colorado State Attorney Generals' Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Gale Norton was operating under color of law within the scope of her employment.

United States Attorneys Office  
1961 Stout St., Suite. 1200  
Denver, CO 80294  
William Pharo

At all pertinent times herein, Defendant, William Pharo, was employed as an Attorney at Law with the U.S. Attorneys' Office. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff

grievous damages. At all pertinent times herein, William Pharo was operating under color of law within the scope of his employment.

Jefferson County Sheriff  
Jefferson County Sheriffs Department,  
Incorporated  
200 Jefferson County Parkway- Suite  
200  
Golden, Colorado, 80401

Arapahoe County Sheriff  
Arapahoe County Sheriffs Department  
5686 South Court Place  
Littleton, Colorado 80203

City of Golden, Incorporated  
911 10th Street  
Golden, Colorado 80401

City of Littleton  
225 West Berry Avenue  
Littleton, Colorado

City of Aurora  
1470 South Havana  
Aurora, Colorado

City of Greenwood Village  
City Hall 6060 South Quebec Street  
Greenwood Village, Colorado 80111-  
4591

U S West, Incorporated  
7800 East Orchard Road- Suite 190  
Post Office Box 6508  
Englewood, Colorado 80155-6508

Missouri Synod Lutheran Church  
Incorporated  
Quigley & Bruce  
Neal A. Quigley  
1010 Cherry Tower  
950 South Cherry Street  
Denver, Colorado 80222

Bethlehem Lutheran, Inc.

Office Space Saving Concepts,  
Incorporated  
10060 West Grand Avenue  
Littleton, Colorado 80137



STATE OF COLORADO  
State Capitol Bldg.  
Denver, Colorado

Spyderco, Incorporated  
Louis S. Glesser:  
P.O. Box 800  
4565 North Highway 93  
Golden, CO 80403

Spyderco, Inc. Louis S. Glesser.  
At all pertinent times herein,  
Defendant, Louis S. Glesser, was  
employed as Owner of Spyderco,  
Incorporated. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Louis S. Glesser was  
operating within the scope of his  
employment.

44] Jefferson County Board of  
Commissioners  
100 Jefferson County Parkway, Golden,  
Colorado

45] Arapahoe County Board of  
Commissioners  
5334 South Prince, Littleton,  
Colorado

Karsh & Fulton, P.C.  
Cherry Tower Office Building- Suite  
710  
950 South Cherry Street  
Denver, Colorado 80222-2665

Family Zehnder  
5587 South Urban Street  
Littleton, Colorado 80127

TAMARA A. GARTIN.  
At all pertinent times herein,  
Defendant, Tamara Ann Zehnder  
(Gartin), was employed with the U S  
West, Incorporated. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation

of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Tamara Ann Zehnder  
(Gartin) was operating within the  
scope of her employment.

Robert V. Zehnder Estate  
At all pertinent times herein,  
Defendant, Pastor Robert V. Zehnder  
Estate, was employed as a Senior  
Pastor with the Bethlehem Lutheran  
Church & School, Incorporated.  
Defendant had knowledge that the  
deprivations were in progress,  
conspired in and had the power and  
the duty to prevent or correct the  
intentional deprivation of  
Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Pastor Robert V.  
Zehnder Estate was operating within  
the scope of his employment.

Dolores J. Zehnder  
At all pertinent times herein,  
Defendant, Dolores J. Zehnder, was  
employed as a Senior Agent with the  
Bethlehem Lutheran Church & School,  
Incorporated. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Defendant, Dolores J.  
Zehnder was operating within the  
scope of her employment.

Office Space Saving Concepts,  
Incorporated  
10060 West Grand Avenue  
Littleton, Colorado 80137  
Timothy Zehnder  
At all pertinent times herein,  
Defendant, Timothy Zehnder, was  
employed as owner of the Office Space  
Saving Concepts, Incorporated  
Defendant had knowledge that the  
deprivations were in progress,  
conspired in and had the power and  
the duty to prevent or correct the

intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Timothy Zehnder was operating within the scope of his employment.

Francisca Zehnder

At all pertinent times herein, Defendant, Francisca Zehnder, was employed as a senior manager with the U S West, Incorporated and owner of Office Space Saving Concepts, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Francisca Zehnder was operating within the scope of her employment.

Markus Bernard Merritt  
16656 East Mansfield Circle  
Aurora, Colorado 80017

Markus B. Merritt

At all pertinent times herein, Defendant, Markus Bernard Merritt, was employed as the Legal Director/ Advisor by the Zehnder Family and by U S West, Inc. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Markus Bernard Merritt was operating within the scope of his employment.

Missouri Synod Lutheran Church  
Incorporated  
Quigley & Bruce  
1010 Cherry Tower  
950 South Cherry Street  
Denver, Colorado 80222

David Langewisch

At all pertinent times herein, Defendant, David Langewisch, was employed as a Pastor with the Missouri Synod Lutheran Church Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, David Langewisch was operating within the scope of his employment.

Peter Woodward

At all pertinent times herein, Defendant, Peter Woodward, was employed as a Pastor with the Missouri Synod Lutheran Church Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Peter Woodward was operating within the scope of his employment.

Chet Shoaf

At all pertinent times herein, Defendant, Chet Shoaf, was employed as a Pastor with the Missouri Synod Lutheran Church Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Chet Shoaf was operating within the scope of his employment.

U S West, Incorporated  
7800 East Orchard Road- Suite 190  
Post Office Box 6508  
Englewood, Colorado 80155-6508

Richard McCormick  
At all pertinent times herein,  
Defendant, Richard McCormick, was  
employed as an Executive Officer with  
the U S West, Incorporated.  
Defendant had knowledge that the  
deprivations were in progress,  
conspired in and had the power and  
the duty to prevent or correct the  
intentional deprivation of  
Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages.. At all pertinent  
times herein, Richard McCormick, was  
operating under color of law within  
the scope of his employment.

Karsh & Fulton, P.C.  
Cherry Tower Office Building- Suite  
710  
950 South Cherry Street  
Denver, Colorado 80222-2665

Daniel Manson  
At all pertinent times herein,  
Defendant, Daniel Manson, was  
employed as a process server with  
Karsh & Fulton, P.C. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Daniel Manson was  
operating within the scope of his  
employment.

Ernest L. Laseter  
1400 Golden Circle #108  
Golden, Colorado 80401  
Ernest L. Laseter  
At all pertinent times herein,  
Defendant, Ernest Lynn Laseter, a  
confidential police informant, was  
employed as a consultant and agent  
sub-contractor. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages.. At all pertinent  
times herein, Ernest Lynn Laseter was

operating within the scope of his  
employment.

U S West, Incorporated  
7800 East Orchard Road- Suite 190  
Post Office Box 6508  
Englewood, Colorado 80155-6508

Bill Stevens  
At all pertinent times herein,  
Defendant, Bill Stevens, employed as  
a Senior Security Agent with the U S  
West, Incorporated. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Bill Stevens was  
operating within the scope of his  
employment.

Greenwood Village, Incorporated  
City Hall, 6060 South Quebec Street  
Greenwood Village, Colorado 80111-  
4591

Rich Waugh  
At all pertinent times herein, Rich  
Waugh, was employed as a Chief of  
Police, a sworn law enforcement  
officer for Greenwood Village,  
Incorporated. Defendant had  
knowledge that the deprivations were  
in progress, conspired in and had the  
power and the duty to prevent or  
correct the intentional deprivation  
of Plaintiffs' Constitutionally  
guaranteed Rights, causing Plaintiff  
grievous damages. At all pertinent  
times herein, Rich Waugh was  
operating under color of authority  
within the scope of his employment.

Roy Romer  
400 East Eighth Avenue  
Denver, Colorado

Roy Romer  
At all pertinent times herein,  
Defendant, Roy Romer, was employed as  
Governor of the state of Colorado, a  
Sworn Administrative Officer with the  
state of Colorado. Defendant had  
knowledge that the deprivations were

in progress in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein Roy Romer was operating under color of authority within the scope of his employment.

Jefferson County Sheriffs Department,  
Incorporated  
200 Jefferson County Parkway- Suite  
200  
Golden, Colorado, 80401

Ronald Beckham  
At all pertinent times herein, Defendant, Ronald Beckham, was employed as Jefferson County Sheriff, a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ronald Beckham was operating under color of authority within the scope of his employment.

Donald Estep  
At all pertinent times herein, Defendant, Donald Estep, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Donald Estep was operating under color of authority within the scope of his employment.

James D. Johnson  
At all pertinent times herein, Defendant, James D. Johnson, was

employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, James D. Johnson was operating under color of authority within the scope of his employment.

Grant Whitus.  
At all pertinent times herein, Defendant, Grant M. Whitus, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Grant M. Whitus was operating under color of authority within the scope of his employment.

Deputy Martin  
At all pertinent times herein, Defendant, Deputy Martin, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Deputy Martin was operating under color of authority within the scope of his employment.

Dennis Beery

At all pertinent times herein, Defendant, Dennis Beery, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages.. At all pertinent times herein, Dennis Beery, was operating under color of authority within the scope of his employment.

Allen L. Simmons

At all pertinent times herein, Defendant, Allen L. Simmons, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Allen L. Simmons was operating under color of authority within the scope of his employment.

Lieutenant Manwaring

At all pertinent times herein, Defendant, Lieutenant Manwaring, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Lieutenant Manwaring was operating under color of authority within the scope of his employment.

Sgt. Williams

At all pertinent times herein, Defendant, Sgt. Williams, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Sgt. Williams was operating under color of authority within the scope of his employment.

Kirk G. Beaulieu

At all pertinent times herein, Defendant, Kirk G. Beaulieu, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Kirk G. Beaulieu, was operating under color of authority within the scope of his employment.

Barry L. Williams

At all pertinent times herein, Defendant, Barry L. Williams, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Barry L. Williams was operating under color of authority within the scope of his employment.

Raymond Fleer

At all pertinent times herein, Defendant, Raymond Fleer, was employed as a Sworn Senior Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Raymond Fleer was operating under color of authority within the scope of his employment.

Joseph McGuire

At all pertinent times herein, Defendant, Joseph McGuire, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Joseph McGuire was operating under color of authority within the scope of his employment.

Frank Lastoczy

At all pertinent times herein, Defendant, Frank Lastoczy, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Frank Lastoczy was operating under color of authority within the scope of his employment.

Jack Jackala

At all pertinent times herein, Defendant, Jack Jackala, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Jack Jackala was operating under color of authority within the scope of his employment.

Sgt. Walcher

At all pertinent times herein, Defendant, Sgt. Walcher, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages.. At all pertinent times herein, Sgt. Walcher was operating under color of authority within the scope of his employment.

Lt. Shrader

At all pertinent times herein, Defendant, Lt. Shrader, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Lt. Shrader was operating under color of authority within the scope of his employment.

Randall West

At all pertinent times herein, Defendant, Randall West, was employed as a Sworn Law Enforcement Officer with the Jefferson County Sheriffs Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Randall West was operating under color of authority within the scope of his employment.

Arvada Police Department,  
Incorporated  
8101 Ralston Road  
Arvada, Colorado 80002

Daryl Hoffman

At all pertinent times herein, Defendant, Daryl Hoffman, was employed as a Sworn Law Enforcement Officer with the Arvada Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Daryl Hoffman was operating under color of authority within the scope of his employment.

Mark Nazaryk

At all pertinent times herein, Defendant, Mark Nazaryk, was employed as a Sworn Law Enforcement Officer with the Arvada Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Mark Nazaryk was operating under color of authority

within the scope of his employment.

A.J. DeAndrea

At all pertinent times herein, Defendant, A.J. DeAndrea, was employed as a Sworn Law Enforcement Officer with the Arvada Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, A.J. DeAndrea was operating under color of authority within the scope of his employment.

Golden Police Department,  
Incorporated  
911 10th Street  
Golden, Colorado 80401

Michael Moler

At all pertinent times herein, Defendant, Michael Moler 1465, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages.

Bill Killpatrick

At all pertinent times herein, Defendant, Bill Killpatrick, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Bill Killpatrick was operating under color

of authority within the scope of his employment.

Russell Cook

At all pertinent times herein, Defendant, Russell Cook, was employed as the Chief of Police, a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Russell Cook was operating under color of authority within the scope of his employment.

Dave Farley

At all pertinent times herein, Defendant, Dave Farley, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Dave Farley was operating under color of authority within the scope of his employment.

Robert Tortora

At all pertinent times herein, Defendant, Robert Tortora, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Robert Tortora was operating under color of

authority within the scope of his employment.

Glenn Moore

At all pertinent times herein, Defendant, Glenn Moore 1470, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Glenn Moore 1470 was operating under color of authority within the scope of his employment

Lewis Shellenberger

At all pertinent times herein, Defendant, Lewis Shellenberger 2031, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Lewis Shellenberger 2031 was operating under color of authority within the scope of his employment.

Ted Schnack

At all pertinent times herein, Defendant, Ted Schnack 2011, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ted Schnack 2011, was operating under color of authority within the scope



of his employment.

Mike Hendershot

At all pertinent times herein, Defendant, Mike Hendershot, was employed as a Sworn Law Enforcement Officer with the Golden Police Department, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Mike Hendershot was operating under color of authority within the scope of his employment.

Greenwood Village, Incorporated  
City Hall 6060 South Quebec Street  
Greenwood Village, Colorado 80111-4591

Mark Stadterman

At all pertinent times herein, Defendant, Mark Stadterman, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Mark Stadterman was operating under color of authority within the scope of his employment.

John Carr

At all pertinent times herein, Defendant, John Carr, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff

grievous damages. At all pertinent times herein, John Carr was operating under color of authority within the scope of his employment.

Jeff Mulqueen

At all pertinent times herein, Defendant, Jeff Mulqueen, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Jeff Mulqueen was operating under color of authority within the scope of his employment.

Bruce Davis

At all pertinent times herein, Defendant, Bruce Davis, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Bruce Davis was operating under color of authority within the scope of his employment.

Ewan Scouse

At all pertinent times herein, Defendant, Ewan Scouse, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ewan Scouse was operating under color of authority

within the scope of his employment.

David Fisher

At all pertinent times herein, Defendant, David Fisher, was employed as a Sworn Law Enforcement Officer for Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, David Fisher was operating under color of authority within the scope of his employment.

Steven Crowell

At all pertinent times herein Steven S. Crowell, Jr. was employed as a City Manager for the city of Greenwood Village, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Steven S. Crowell, Jr. was operating under color of authority within the scope of his employment.

Lakewood Police Department  
445 South Allison Parkway  
Lakewood, Colorado 80226

Michael Harris

At all pertinent times herein, Defendant, Michael Harris, was employed as a Sworn Law Enforcement Officer with the Lakewood Police Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent

times herein, Michael Harris was operating under color of authority within the scope of his employment.

Susan Hines

At all pertinent times herein, Defendant, Susan Hines, was employed as a Sworn Law Enforcement Officer with the Lakewood Police Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages.. At all pertinent times herein, Susan Hines was operating under color of authority within the scope of her employment.

Mary Sutton

At all pertinent times herein, Defendant, Mary Sutton, was employed as a Sworn Law Enforcement Officer with the Lakewood Police Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Mary Sutton was operating under color of authority within the scope of her employment.

Aurora Police Department  
1470 South Havana  
Aurora, Colorado 80012

Pete Page

At all pertinent times herein, Defendant, Pete Page, was employed as a Sworn Law Enforcement Officer with the Aurora Police Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally

guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Pete Page was operating under color of authority within the scope of his employment.

Arapahoe County Sheriffs Department  
5686 South Court Place  
Littleton, Colorado 80203

Patrick Sullivan

At all pertinent times herein, Defendant, Patrick Sullivan, was employed as Arapahoe County Sheriff, a Sworn Law Enforcement Officer with the Arapahoe County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Patrick Sullivan was operating under color of authority within the scope of his employment.

W.H. Fields

At all pertinent times herein, Defendant, W.H. Fields, was employed as Arapahoe County Deputy Sheriff, a Sworn Law Enforcement Officer with the Arapahoe County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, W.H. Fields. was operating under color of authority within the scope of his employment.

Vincent Landis

At all pertinent times herein, Defendant, Vincent Landis, was employed as Arapahoe County Sheriff, a Sworn Law Enforcement Officer with the Arapahoe County Sheriffs Department. Defendant had knowledge

that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Vincent Landis. was operating under color of authority within the scope of his employment.

Ethan Feldman

At all pertinent times herein, Defendant, Ethan Feldman, was employed as Arapahoe County Sheriff, a Sworn Law Enforcement Officer with the Arapahoe County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Ethan Feldman was operating under color of authority within the scope of his employment.

City of Littleton  
Police Department  
225 West Berry Avenue  
Littleton, Colorado

Robert L. Allen

At all pertinent times herein, Robert L. Allen, was employed as a sworn law enforcement officer for City of Littleton, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Robert L. Allen was operating under color of authority within the scope of his employment.

Chief of Police, Littleton Police  
Department

At all pertinent times herein, Chief of Police was employed as a sworn law enforcement officer for City of Littleton, Incorporated. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, the Littleton Chief of Police was operating under color of authority within the scope of his employment.

Douglas County Sheriffs Department  
355 South Wilcox Avenue  
Castle Rock, Colorado 80104

Steve Zotos

At all pertinent times herein, Defendant, Steve Zotos, was employed as Douglas County Sheriff, a Sworn Law Enforcement Officer with the Douglas County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Steve Zotos was operating under color of authority within the scope of his employment.

Robert Wood

At all pertinent times herein, Defendant, Robert Wood, was employed as Douglas County Deputy Sheriff, a Sworn Law Enforcement Officer with the Douglas County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Robert Wood was operating under color of authority

within the scope of his employment.

Robert McMahon

At all pertinent times herein, Defendant, Robert McMahon, was employed as Douglas County Deputy Sheriff, a Sworn Law Enforcement Officer with the Douglas County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Robert McMahon was operating under color of authority within the scope of his employment.

Kim Castellano

At all pertinent times herein, Defendant, Kim Castellano, was employed as Douglas County Deputy Sheriff, a Sworn Law Enforcement Officer with the Douglas County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Kim Castellano was operating under color of authority within the scope of his employment.

Corporal Reese

At all pertinent times herein, Defendant, Corporal Reese, was employed as Douglas County Sheriff, a Sworn Law Enforcement Officer with the Douglas County Sheriffs Department. Defendant had knowledge that the deprivations were in progress, conspired in and had the power and the duty to prevent or correct the intentional deprivation of Plaintiffs' Constitutionally guaranteed Rights, causing Plaintiff grievous damages. At all pertinent times herein, Corporal Reese was

operating under color of authority

within the scope of his employment.

Ex Rel.

Know all men by these presents,

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with standing to bring this case, being in possession of all unalienable rights and protected by the Constitution of the united States and Colorado state: for the People of the united States of America, under the American Flag of Peace, without an attorney, Ex Rel. state:

1. Ex Rel: for the people of the united States defined: "But it is the manner of enforcement which gives 42 U.S.C.A. 1983 its unique importance, for the enforcement is placed in the hands of the people." Each citizen, "acts as a private attorney general who takes on the mantle of the sovereign, guarding for all of us the individual liberties enunciated in the constitution." Section 1983 represents a balancing feature in our governmental structure whereby individual citizens are encouraged to police those who are charged with policing us all.

#### JUDICIAL CAPACITY

2. The Constitution of the united States, U.S.C.A. Article III, 1 Note 62. A "controversy" in the constitutional sense must be one that is appropriate for judicial determination, be definite and concrete touching legal relations of parties having adverse legal interests, and be a real and substantial controversy admitting of specific relief through decree of conclusive character.

3. The Constitution of the united States, U.S.C.A., Article III, 1 Note 64. Exercise of judicial power under the Constitution depends on existence of case or controversy.

4. The Constitution of the united States, U.S.C.A., Article III, 1 Note 162. Judicial power of the United States is vested in federal courts and extends to prosecutions for violations of criminal laws of United States.

#### CONSTITUTIONAL COURT

5. The Constitution of the united States, U.S.C.A., Article III, 1 Note 92. Constitutional Courts. "Constitutional courts" are those recognized and provided for in this section and includes Supreme Court and inferior courts which Congress may from time to time ordain and establish under authority conferred thereby.

6. The Constitution of the United States, U.S.C.A., Article III, 1 Note 114 "district court of the United States" without more, means solely courts created by Congress under this article and not territorial courts.

#### CASE LAW

7. The Constitution of the United States, U.S.C.A., Article III, 2 Note 131 This clause embraces alike civil and criminal cases arising under the Constitution and law; both are equally within the dominion of the judicial powers of the United States, and there is nothing in the grant to justify an assertion that whatever power may be exerted over a civil case may not be exerted as fully over a criminal one.

The following facts establish the rules to be used by the court. Notice that the Federal rules of Civil Procedure are written as limits for litigants in the United States District Court. Also notice that while those rules are intended for use in law cases, they do not limit the litigant in law to using just those rules. Indeed those rules cannot limit the relief of litigants in law.

8. The Constitution of the United States, U.S.C.A., Article III 1 Note 54 Congress possesses the sole right to say what shall be the forms of proceedings, whether in equity or at law. Congress possesses the sole right to say what shall be the forms of proceedings, either in equity or at law, in the courts of the United States, and in what cases an appeal shall be allowed or not; Congressional power to prescribe procedure to be employed by court created pursuant to this article is limited by the Constitution and specifically by Amendment Seven.

9. The Constitution of the United States, U.S.C.A., Article III 1 Note 23. The Constitution of the United States and Acts of Congress recognize and establish the distinction between law and equity; the remedies in the courts of the United States are, at common law or in equity, not according to the practice of state courts, but according to the principles of common law and equity, as distinguished and defined in that country from which we derive our knowledge of those principles.

Distinction between law and equity must be preserved in federal courts under constitutional provision defining judicial power of United States, . . .

Under the Federal Constitution, the distinction between law and equity must be observed. Though under Rule 2, Federal Rules of Civil Procedure, 28 U.S.C.A. all distinction as to form between actions at law and suits in equity have been abolished the difference in substance in federal judicial power between law and equity is imbedded in the constitution and remains unaltered.

#### RULES

10. P.L. 675 Chapter 445, 54 Stat. 688, (1940) Congress makes rules for court procedure.

11. P.L. 415 Chapter 631, 48 State 1064, (1934) . . . Section 2 The court may at any time unite the general rules prescribed by it for cases in equity with those in actions at law so as to secure one form of civil action and procedure for both; Provided, however, that in such union of

rules the right of trial by jury as at common law and declared by the seventh amendment of the Constitution, shall be preserved to the parties inviolate.

12. Prejudice means: aforejudgement; bias; partiality; preconceived opinion. A leaning toward one side of a cause for some reason other than conviction of its justice. Black's Law Dictionary 6th. Any and all presumptions and any and all associations in common.

#### CONTROVERSY

13. U.S.C.A., The Constitution of the United States, Article III, Case Note 62

#### SPECIFIC Charges

14. Defendant Judicial Officers, each of them and them all, hereinafter referred to as "Judges," et al, having superior knowledge of the law and a high standard of the law as confirmed by their oath of office, and witnessing the fraud committed by Defendant Officers of the Court, hereinafter referred to as "Attorneys," when those Attorneys brought false, fraudulent and unfounded suits against Plaintiff herein, in conspiracy with private Citizens, who was not the person named on the complaint; those Defendant Judges, Attorneys, and Citizens, and all of them in each and every cause of action herein indicated of this action, KNOWINGLY caused damages and deprivation and neglected to correct or prevent the wrongs pursuant to Title 42 U.S.C.A., 1986.

15. Defendant Judges, each and every one of them and et al, in court rooms they themselves knowingly colored with an Executive Flag, pursuant to Title 4 U.S.C.A. 1, Part II, in a "Federal Agency," 1994 Act to Reorganize the Govt. 63 Statutes at Large, Chapter 288, Sec. 3 (b), the term "Federal Agency" means any executive agency or establishment in the legislative or Judicial branch of government, Title 5, p. 739 section 5721.

"Agency" means (C) a court of the United States; took rights from Plaintiffs herein, Plaintiff's Rights and Liberty, by means of illegal compulsion and oppressive exaction, compelling judgments on the Plaintiff, when Plaintiff was not named on legal process in cases enumerated above by Color of Defendant Judge s Office as Judicial Officer in conspiracy with Defendant Attorney 'a office as Officer of the Court in the same Bar Association shall be fined not more than \$5,000 or imprisoned not more than three years, or both.

16. Defendant Quasi-Military Troops, hereinafter referred to as "Cops", operating in Color of Authority, conferred by Color of Law, and each and every one of them above titled - and others yet to be discovered, knowingly and willingly acted in concert and conspiracy with Defendant Judges, Attorneys, Legal Assistants, Corporations, and private Citizens in behalf of Defendant "Persons" to deprive constitutionally guaranteed



Rights of this Proper Party Injured. These acts were committed in high knowledge of the Law, evidenced by each and every "Cop's" Oath of Office and by threatened use of dangerous weapons, intimidation, duress, fraud and mayhem; when each and every one of the above titled Defendant Cop's went in disguise upon the Highways and on the premises of another with the expressed purpose and intent of depriving Plaintiff of constitutionally guaranteed rights at Amendment 1, 2, 4, 5, 6, 7, 8, 9, 10, 13, & 14 of the United States Constitution and corresponding Titles of the Colorado Constitution.

17. Applicable Statutes and Codes

42 U.S.C.A. 1986: Defendants each had knowledge of the law and did or witnessed wrongs committed in their presence and neglected to correct and prevent.

42 U.S.C.A. 1985: Defendants each acted in Concert under color of law to deprive Constitutionally guaranteed rights.

42 U.S.C.A. 1983: Defendants each caused damages.

The neglects or actions of each of the Defendants violated Statutes that bind officers under color of authority and under color of law.

18 U.S.C.A., 241: Conspiracy against Rights

18 U.S.C.A., 242: Deprivation of rights in color of authority

18 U.S.C.A., 872: Extortion in color of authority

18 U.S.C.A., 1621: Perjury of Oath of Office

The Rules of Court show that Defendant's actions granted no jurisdiction over the Plaintiff in the lower court case.

F.R.C.P. 19 and 12 (b) (7) No Joinder of parties

F.R.C.P. 12(b)(6) Failed to State a Claim upon which relief can be granted

F.R.C.P. 12(b)(1) and (2) Lack's personam and subject matter jurisdiction.

DEFENDANTS UNLAWFUL WARRANTLESS ARREST OF PLAINTIFF IN CONSPIRACY TO DEPRIVE RIGHTS AS AN OBSTRUCTION OF JUSTICE

On or about February 26, 1997 the Jefferson County Special Weapons and Tactics Military Unit, standing and paid for over two years, in violation of the Constitution of the United States of America, did unlawfully attack the Home of Ernest Lynn Laseter at the mailing location of 1400 Golden Circle #108 in Golden, Colorado in full force of arms to include; Fully Automatic Weapons with Laser sights, full Riot Gear, S.W.A.T. "Shields" and Body Armor. These Military Troops, in disguise as Jefferson County Sheriff Deputies, clothed in Black Uniforms, Ski Masks and bearing NO IDENTIFYING MARKINGS DID UNLAWFULLY go in disguise upon the highways AND on the premises of another, in conspiracy, in full knowledge of their actions, with the specific INTENT, the means, and with the motive to UNLAWFULLY ARREST Plaintiff, who had committed no crime, within or without the sight or knowledge of the Defendants herein referred to as

"Quasi-Military Troops" and hereinafter abbreviated by the notation, "Cops" et al.

Said "Cops" resorted to the use of a BATTERING RAM to break down the locked Door at the above noted home residence; without probable cause, without a lawful warrant, and without any knowledge of; who was inside the private residence, or whom they intended to unlawfully arrest after smashing in the door. Defendant Jefferson County Deputy Sheriffs and other Defendant Law Enforcement Officers called out the name of a person who was not known or present in the premises, claimed to have an Arrest Warrant that they did not possess, aimed at least six Laser-sighted Automatic weapons on this Plaintiff and threatened him . . . "If you do ANYTHING -you WILL BE SHOT" . . . that, a direct quote from the audio tape recording of the Assault and Criminal Trespass, Attempted Murder and Unlawful Arrest, and all under Color of Law and Color of Authority, which are the subject of this Complaint. Said Audio Tape is included as sure evidence of the criminal actions of "Cops" known as Jefferson County Special Weapons and Tactics team at 1400 Golden Circle #108 in Golden, Colorado on the 26th day of February in the year of our Lord, Jesus, Nineteen Hundred and Ninety Seven in the Colorado Republic.

After unlawfully arresting, assaulting, battering, and committing mayhem upon the person and property of Plaintiff and the resident of the property, Defendant Sheriff Deputies then HANDCUFFED this Totally Compliant and unresisting Plaintiff with torturous bone-tight "Riot Cuffs, although regular steel handcuffs were available and are preferred, and transferred Plaintiff to another Defendant Sheriff Deputy who unlawfully Forcibly Kidnapped Plaintiff, and illegally transported Plaintiff to the Jefferson County Sheriff Department Detention Center without knowledge of the Identity or the alleged crime committed by the Plaintiff as there was no Arrest Warrant or other proper order of any court.

Plaintiff was tortured by riot handcuffs for over SIX HOURS while "terrorists" disguised as the Defendant Sheriffs Deputies attempted to extort information from Plaintiff. Plaintiff knew that his Liberty and Freedom had been trespassed and Fully Informed each and every Defendant Deputy and Defendant Law Enforcement Officer within hearing of their Violations of Plaintiff's Civil Rights and their numerous CRIMES against the Plaintiff, and the Deprivation of Rights against the Plaintiff. Each and every Defendant "Cop" refused to Cease and Desist their Criminal Actions even after being fully informed of the Law and failed and neglected to prevent or correct wrongs and to do their Sworn Duty to Uphold the Constitution of the United States of America and the Colorado Constitution.

Rather than relenting, the Defendant "Cops" further engaged in torture and torment of Plaintiff for the directly expressed purpose of Extorting a Waiver of Plaintiff's Rights in Color of Authority and under Color of Law, in Conspiracy and in full knowledge; each Actor having the ability to prevent or correct, witnessing the Deprivations being committed

against the Plaintiff and REFUSING and NEGLECTING and FAILING to Correct or Prevent the WRONGS being COMMITTED in each actor's direct presence, when each Actor, "COP," had a Duty to protect and defend Plaintiff's Rights.

#### UNLAWFUL WARRANTLESS ARREST \_ Denial of Due Process

Claim I: Heavily Armed Military Troops, in disguise as Multi-Jurisdictional Jefferson County Special Weapons and Tactics Team Division of the Jefferson County Sheriff's Department did unlawfully ATTACK a private residence in order to illegally arrest Plaintiff.

Supporting Facts: Through an elaborate Conspiracy and meeting of minds of; Defendant Private Citizens who intended and stated with malice and aforethought to unlawfully murder Plaintiff by use of government financed quasi-military troops or otherwise; Defendant Officers of the Court who instigated, designed, masterminded and implemented said conspiracy; compliant quasi-judicial and de facto Defendant Judicial Officers for hire, military troops in disguise as the Defendant Officers of the Law, and Defendant Corporate Officers with specific fiduciary and other interests to protect from the light of truth; ALL conspired and colluded with foul intent to develop a false-persona of Plaintiff whereby the "government" would view Plaintiff as a threat, and deploy Heavily Armed Troops to NEUTRALIZE the DANGER.

Claim II: Criminal Trespass: Breaking and Entering - Denial of Due Process

Military Troops in disguise as Officers of the Law, termed Jefferson County Sheriff's Department, and Special Weapons and Tactics Team "Made Entry" unlawfully into private residence.

supporting Facts: On or about February 26, 1997 Jefferson County S.W.A.T. Team did apply the "Department Ram" to the private residence located at 1400 Golden Circle #108 in Golden Colorado.

Sheriff Deputies did then unlawfully bash in the residence door and invaded the residence in an "overwhelming" force of arms and with numerous armed military troops. Defendant Sheriff Deputies did not have in their possession any Warrant, either lawful or unlawful. Defendant Sheriff Deputies did at that time completely destroy the residence door, which was private property, with the "Department Battering Ram." Sheriff Deputies did make open threats of direct murder upon the person of Plaintiff. The audio tape of the Criminal Trespass confirms the ultimate fact that Defendant Sheriff Deputies broke into this private residence with the INTENT to commit murder upon the Plaintiff.

CLAIM III - ASSAULT & BATTERY UNDER COLOR OF AUTHORITY

Plaintiff incorporates foregoing as if completely reproduced herein. Immediately after Sheriff's Deputies Trespassed by Unlawful Breaking & Entering into a private residence, Defendants did unlawfully Assault Plaintiff with fully automatic weapons by jamming the muzzles of those automatic weapons into Plaintiff's spine, ribs and head with unjustifiable force. Plaintiff offered NO resistance. Sheriff's Deputies then unlawfully HANDCUFFED Plaintiff, who was NOT charged with a felony, for NO VALID reason or purpose, other than to torture and humiliate Plaintiff. Said unlawful actions being committed under Color of Law, caused Plaintiff damages including but not limited to, Physical Trauma, Psychological Trauma, Physical Pain, enduring physical injuries, humiliation, and deep emotional trauma.  
CLAIM IV - Cruel and Unusual Punishment and Sadistic Treatment under color of authority

Deputies applied 'temporary' Riot Handcuffs with excessive force, thus cutting off the blood circulation to Plaintiff's arms and hands, a known method of torture. The Riot Handcuffs were then also 'cranked up' in such a manner as to initiate intense pain in Plaintiffs arms, shoulders and spine. Plaintiff was totally compliant, offered NO RESISTANCE and made NO effort to escape the unlawful arrest. Said excessive force, being committed in color of authority caused Plaintiff damages including' but not limited to; Physical Trauma, Psychological Trauma, Physical pain, enduring physical injuries, humiliation, and deep emotional trauma.

CLAIM V - KIDNAPPING - Deprivation of Plaintiffs Right to Due Process of Law or Equal Protection of the Law

Defendant Sheriff's Deputies, forcibly removed Plaintiff from the private residence in which they unlawfully arrested him - IN HANDCUFFS and placed Plaintiff in another Deputies Automobile. Said Defendant Deputy Martin; did not have knowledge of Plaintiff's identity, had not witnessed a crime, did not have a valid warrant, and refused to loosen the 'temporary use' Riot Handcuffs that were, by then, causing Plaintiff even greater pain and suffering as Plaintiff was now forced to sit in the back seat with his arms and hands painfully cranked up behind his back. Defendant Sheriff Deputy Martin repeatedly refused to loosen or adjust the handcuffs.

Deputy Martin transported Plaintiff directly to the Jefferson County Detention Facility although Defendant was informed by Plaintiff that he is required by Law to take any arrested person DIRECTLY before the nearest magistrate of competent jurisdiction - which Magistrate, Plaintiff had reason to believe, was directly across the street from the Detention Facility. Defendant Martin did knowingly and willfully kidnap the Plaintiff in reckless and wanton disregard for the Law of the Land in furtherance of the 'Conspiracy'. Said acts, committed in Color of Authority, caused the Plaintiff damages, including, but not limited to,

Physical Trauma, enduring physical injuries, psychological pain and suffering, loss of time, loss of income, loss of FREEDOM, deep emotional trauma, humiliation and distress.

CLAIM VI - DENIAL OF DUE PROCESS - Unlawful Booking procedures

Defendant Deputy Sheriff Martin refused to take Plaintiff before the nearest magistrate and instead took Plaintiff into the Jefferson County Detention Facility for interrogation, booking, fingerprinting, photographing and immediate, unjustified and unlawful incarceration. Defendant Deputy Sheriff Martin did not know whom he had arrested, he was aware of NO CRIME committed by the unknown detainee, and yet he repeatedly refused to release Plaintiff or loosen the HANDCUFFS to prevent additional pain and suffering to Plaintiff, a totally compliant Citizen whom NO ONE had seen commit ANY CRIME whatsoever.

Deputy Martin continued to attempt to Extort Plaintiff into telling him the unlawfully detained Plaintiff's identity by threats, attempts to humiliate, denial of and the failure to provide basic human necessities and the riot handcuffs. Said extortion and deprivation of Plaintiff's Rights being in Color of Authority caused Plaintiff damages including but not limited to loss of time, damage to reputation, loss of income, intense pain and suffering, loss of FREEDOM, deep emotional trauma, humiliation and distress.

Deputy Martin was fully informed by Plaintiff during the Kidnapping of the trespass upon the Rights of the Plaintiff by the unlawful Arrest and above stated deprivation of Plaintiff's Constitutionally guaranteed rights. Defendant Martin had NO EXCUSE!

Claim VII - Defendants denial of Due Process of Law - Denial of access to the courts- Denial of Equal protection of the Law.

Defendant Sheriffs Deputies' Reports, on file, confirm that the Plaintiff was unlawfully arrested at approximately 3 PM on a Wednesday. The Courts were open and Defendant Deputy Martin neglected and failed to take Plaintiff before the nearest Magistrate, and without unnecessary delay, as required by law; depriving Plaintiff of Due Process of law. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim VIII - Sadistic Treatment, Cruel and unusual punishment for no crime and without due process of the law, failure to neglect or prevent wrongs or to provide equal protection of the law to Plaintiff and in conspiracy.

Defendant Deputy Sheriff Martin witnessed no crime committed, and yet Deputy Martin paraded Plaintiff around the Booking Rooms while Plaintiff was tightly restrained unnecessarily, still in riot handcuffs and for an extended period of time. Plaintiff politely and repeatedly informed Defendant Martin and all the other Defendant Cops present of the gross deprivation of Plaintiffs Rights; delineated and described each Sworn Law Enforcement Officers' Duty to Correct and Prevent wrongs and Fully Informed each Defendant Officer of the Law present of his/her responsibility under the Constitution, USC. 42 1986, 1985 & 1983 as well as 18 USC 241 & 242.

Defendant Martin became emotional and angry, resorting to excessive and brutal force to throw the already handcuffed and restrained Plaintiff into a "sound proof" room to prevent and obstruct Plaintiff from informing all sworn Peace Officers present of their Duty under the U.S.C., the Constitutions and the Law of the Land. Deputy Martin repeatedly refused to loosen the Riot Cuffs even after Plaintiffs arms and hands had grown numb and purple from swelling. Although Plaintiff cried out for relief from the Torture caused by the "Bone-tight" riot-cuffs- all the sworn Sheriffs Deputies present refused and neglected and failed to correct or prevent serious and permanent injury to Plaintiff. Such willful and malicious torture being in Color of Authority caused Plaintiff Damages. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim IX- Extortion by Torture, Denial of Human Rights and Necessities - Assault and mayhem under color of authority-Denial of Plaintiffs Rights to Due Process of Law and Equal Protection of the Law by Defendants.

Defendant Martin had tried for several hours to Extort a Waiver of Fifth Amendment Rights from Plaintiff by torture in "Bone tight" Riot cuffs. After some six hours, Deputy Martin eventually gave up his efforts and shoved Plaintiff into a "Booking Room" where a fresh set of Interrogators, Defendant Jefferson County Sheriffs Deputies, finally needed to cut the 'temporary use' Riot Cuffs off of Plaintiffs arms with heavy Wire Cutters.

Both Plaintiffs arms were purple and swollen, the left arm was immobile due to the trauma caused by the 5-6 Hours in Bone-tight Riot Cuffs.

Plaintiff repeatedly requested medical triage and treatment for his obvious and painful injuries and was repeatedly Denied by Defendants.

Plaintiff was then stripped, intrusively searched and further interrogated, continuously threatened by Deputies to Extort a Waiver of Fifth Amendment Rights and thrown into the "rubber room" as further and continued torture in order to extort a Waiver or Joinder which Plaintiff would NOT concede.

Plaintiff was held for many hours in this punitive confinement; in an injured condition, without any food or any water, in deliberately frigid conditions, without any bed or blanket, without any toilet and without access to a telephone or any Presentment to a Magistrate all night and into the next day in an attempt to extort by TORTURE a Waiver of Rights or a permissive joinder by speaking Plaintiffs name. Plaintiff refused to waiver or joinder, but did fully inform each Defendant Deputy present of his/her Duty under the law and the Constitutions.

All the Defendants present refused and neglected and failed to prevent or to correct the wrongs they each witnessed; such wrongs committed in Color of Authority caused Plaintiff damages. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to Plaintiffs' reputation and other collateral and related damages.

Claim X - Denial and deprivation of Due Process of Law and the Equal Protection of the Law by Fraud and Deception by the Defendants.

Late Thursday morning, an unknown Defendant Deputy Sheriff told Plaintiff that Defendant Judge Charles T. Hoppin 'had issued a Judicial Order' that 'required' Plaintiff to relinquish a Fingerprint before the Court would 'allow any appearance' by Plaintiff. Fearing not to comply, Plaintiff provided a fingerprint "under duress" and "without prejudice" pursuant to U.C.C. 1-207 & C.R.S. 4-1-207.

Upon the extorted and fraudulently obtained "compliance", Plaintiff was moved to "Classification", only then, after many hours in detention, was Plaintiff allowed toilet, food, water and very restricted access to a "Gateway Technology" telephone pursuant to R.I.C.O. statutes 42 USC 1961. Plaintiff was never presented this so-called "court order" in writing and further has good reason to believe said Deputy Lied and Perpetrated a FRAUD upon Plaintiff.

Said FRAUD by Defendant Sworn Law Enforcement Officer constituting a deprivation of Constitutionally protected Rights causing Plaintiff damages in Color of Authority. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages.

Claim XI - Cruel & Unusual Punishment- Plaintiff was required under threat, in duress and by intimidation to "Force March" in shackles, chains & handcuffs.

Mid-Thursday afternoon Armed Military Troops in disguise as Defendant Sheriffs' Deputies came in force to Plaintiffs' jail cell; bound and shackled Plaintiff, hand, waist and ankles and forced him to march hundreds of yards from the Jefferson County Jail to the Jefferson County Courthouse. Each and every step caused the ankle shackles to tear into Plaintiffs' Achilles tendon, causing permanent scars and injuries. None of the shackles, chains or handcuffs was removed upon entry to the courtroom or later in the holding area. Plaintiff repeatedly informed each and every Defendant Deputy Sheriff of the injuries and each and every Defendant directly refused or failed or neglected to correct or to prevent further injuries. Said acts committed in Color of Authority caused Plaintiff injuries and damages. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XII- Conspiracy to Deprive Plaintiffs' Right to Due Process on 2/27/97 in Courtroom 3A by "Judicial Officer" Charles T. Hoppin,

Defendant Judicial Officer Charles T. Hoppin, hereinafter referred to as "Judge," having superior knowledge of the law and a high standard of the law as confirmed by his oath of office, and witnessing the fraud committed by Defendant Officers of the Court, hereinafter referred to as "Attorneys," when those Attorneys brought Fraudulent, false and frivolous suits against Plaintiff herein, in conspiracy with Defendant Private Citizens, who was not the person named on the complaint.

Defendant Judges, Attorneys, Cops and Citizens, and all of them in each and every cause of action enumerated herein this action, knowingly and deliberately caused damages and deprivation and neglected and failed to correct or to prevent the wrongs pursuant to Title 42 U.S.C.A., 1986.

Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XIII- Deprivation of Due Process- the Presumption of Innocence



Defendant Judicial Officer Charles T. Hoppin, having a superior knowledge of the law and a high standard of the law as confirmed by his oath of office, under arms, and witnessing the fraud committed by Defendant "Attorneys," when those Attorneys deprived Plaintiff of his Constitutionally Guaranteed right to be provided an Indictment, a Summons/Complaint or Information of the Accusation.

Plaintiff was forcibly taken to a "Courtroom" whilst standing in chains and jail clothes, without counsel, surprised; thus denying and removing the Constitutionally guaranteed presumption of innocence and indicating 'guilt'.

Defendants provided No Indictment - No Summons/Complaint or Information in deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law. The deprivation of Constitutionally guaranteed rights caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XIV- Excessive Bail required on 2/27/97- Courtroom 3A by "Judicial Officer" Charles T. Hoppin

Defendant Judicial Officer Charles T. Hoppin, hereinafter referred to as "Judge," having superior knowledge of the law and a high standard of the law as confirmed by his oath of office, and witnessing the fraud committed by Defendant "Attorneys," when those Attorneys deliberately and maliciously deprived the un-represented and un-counseled and indigent Plaintiff of Plaintiff's Constitutionally Guaranteed right to a reasonable Bail under color of state law, caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XV- Charles T. Hoppin - Deprivation of Constitutional Right to Face Witnesses

Defendant Judicial Officer Charles T. Hoppin, hereinafter referred to as "Judge," having superior knowledge of the law and a high standard of the law as confirmed by his oath of office, under arms, and witnessing the Fraud committed by Defendant "Attorneys, in conspiracy with Defendant Private Citizens, to deprive Plaintiff of the right to confront and examine witnesses against him. Defendant Judge, Attorneys, and Citizens, and all of them in each and every cause of action enumerated herein this action, KNOWINGLY caused damages and deprivation and neglected to correct or prevent the wrongs pursuant to Title 42 U.S.C.A., 1986.

Defendant 'Private Citizens' Tamara Ann Zehnder and Marcus Bernard Merritt advanced on the court docket as Witnesses in Complaint. They deliberately chose not to be present at a proper time, obstructing

justice and manipulating the Court, depriving Plaintiff the opportunity to confront these 'Witnesses' against him, as guaranteed in the Constitutions. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XVI - Fraudulent *ex parte* hearing by Magistrate Marilyn Leonard in conspiracy with Defendant Private Citizens Tamara Ann Zehnder and Marcus Bernard Merritt

Defendant Judicial Officer Magistrate Marilyn Leonard, hereinafter referred to as "Judge," having superior knowledge of the law and a high standard of the law as confirmed by her oath of office; under arms, and Witnessing the Fraud committed by Defendant Private Citizens; to deprive Plaintiff of the right to be present at any hearing and to confront and examine witnesses and evidence against him; that Defendant Magistrate Marilyn Leonard, such Attorneys, and Citizens, and all of them in each and every cause of action enumerated herein this action, knowingly and deliberately and maliciously caused damages and deprivation and neglected and failed to correct or to prevent the wrongs pursuant to Title 42 U.S.C.A., 1986.

Plaintiff was subjected to another fraudulent *ex-parte* hearing while available to the Courts requirements. Defendant 'Judge' Magistrate Marilyn Leonard in conspiracy with Private Citizens Tamara Ann Zehnder and Marcus Bernard Merritts' deprivation of Plaintiff's Constitutionally Guaranteed rights to Due Process under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XVII - Cruel and Unusual Punishment

Mid-Thursday afternoon Armed Military Troops in disguise as Sheriffs' Deputies forced Plaintiff to march hundreds of yards from the Jefferson County Courthouse to the Jefferson County Jail after having stood in the chains and shackles for hours. Each and every step caused the ankle shackles to tear into Plaintiffs Achilles tendon, causing permanent scars and injury. Plaintiff informed each and every Deputy of the injuries and each and every Deputy refused or neglected to correct or prevent further injuries. Said acts committed in Color of Authority

caused Plaintiff injuries. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XVIII - Unlawful Service - Unlawful Complaint- 2/28/97- Defendant Magistrate Marilyn Leonard in conspiracy with Deputy Sheriff Frank Lastoczy

Defendant Judicial Officer Magistrate Marilyn Leonard, having superior knowledge of the law and a high standard of the law as confirmed by her oath of office, deprived Plaintiff of Plaintiff's Constitutionally Guaranteed right to due process of law by subjecting Plaintiff to unlawful service by armed Defendant Deputy Sheriff Frank Lastoczy of an unlawful complaint. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XIX - Deprivation of Due Process- Fraudulent probation agreement

Defendant Judicial Officers, each of them and them all, having superior knowledge of the law and a high standard of the law as confirmed by their oath of office, deprived Plaintiff of Plaintiff's Constitutionally Guaranteed right to due process of law by demanding, requiring and subjecting Plaintiff to a 'probation agreement/ pre-trial supervisory agreement' which contained numerous unconstitutional provisions, pejorative restrictions and requirements prior to any trial, any defense or any other 'due process of law'. Defendants deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XX - Defendants Denial of Human Rights, Sadistic Treatment and Cruel and Unusual punishment and for no crime

Plaintiff was released on bail and discharged from the Jefferson County Detention Center. Plaintiff was maliciously denied warmth or shelter or any telephone access or any other necessities of life; at 3:00 A.M. in a dire snow blizzard and without a coat or any proper clothing. The 3:00 A.M. timing was deliberate and malicious and at the order of the Shift Officer in conspiracy and a meeting of the minds with the other Defendant Detention Center staff; to torture, discommode, inflict pain and perhaps cause the death by exposure of Plaintiff, Steve Douglas, Gartin; in deprivation of Plaintiffs constitutionally guaranteed rights.

Defendant Jefferson County Sheriffs Department personnel's deliberate and malicious deprivation of Plaintiff's Constitutionally Guaranteed rights under color of state law caused Plaintiff damages including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

Claim XXI - Defendants Failure and Neglect to Correct or to Prevent Wrongs and Deprivations of Rights to Plaintiff

Plaintiff incorporates Claim I through Claim XX inclusive as if fully reproduced herein. Defendant Law Enforcement Officers, Defendant Judges, Defendant Officers of the Court, each of them and them all; refused, neglected and failed to provide equal protection of the law to Plaintiff and, neglected and failed to correct or to prevent wrongs done to Plaintiff or deprivation of Plaintiffs Rights as they were notified by Plaintiff.

Plaintiff contacted Defendant Law Enforcement Administrative Officers and Internal Affairs Departments, Defendant Administrative and Supervisory Judges and such Defendant Officers of the Court on or reporting to Disciplinary Committees, Defendant Law Enforcement and Investigative Officers and agencies. All Defendants failed to investigate Plaintiffs charges, failed to charge or discipline such named Defendants and failed or neglected to prevent such wrongs and deprivations as were in their immediate knowledge or those sworn and verified by Plaintiff and Witnesses. Such failure by Defendants to secure Plaintiffs Rights, failure to Protect Plaintiffs Rights, failure and neglect to correct or to prevent such wrongs and deprivations caused Plaintiff damage including but not limited to physical trauma, emotional distress, psychological distress, pain and suffering, lost income, loss of Family, loss of career, damage to reputation and other collateral and related damages.

## DAMAGES

18. The facts enumerated in items one (1) through (17) are incorporated herein as if fully reproduced.

19. Plaintiff states with reasonable expectation, that Defendant's unreasonable and unconscionable actions as enumerated herein and certainly proven beyond doubt by prima facie evidence filed in the Court record in this instant matter, have wrongfully deprived Plaintiff of 1st, 4th, 5th, 6th, 7th, 8th and 14th Amendments rights as enumerated in the Bill of Rights to the Constitution for the United States of America.

Said deprivation, being under Color of Law, and in conspiracy, causing damage to Plaintiff.

20. Wherefore Plaintiff demands Compensatory Damages severally against all Defendants herein in the amount of Fifty Million Dollars (\$50,000,000.00), per Defendant, per cause of action.

21. Plaintiff herein demands exemplary damages as a deterrent to future damages in the amount of One Hundred Million Dollars (\$100,000,000.00), per each cause of action as enumerated herein against All Defendants severally.

22. Plaintiff demands reparation for costs and reimbursement of all out of pocket expenses incurred as a result of the filing of this action.

23. Plaintiff requests relief pursuant to the criminal allegations brought herein.

24. Plaintiff further seeks any other relief that the court of proper jurisdiction deems appropriate under the circumstances and the Constitutional controversy raised herein.

## JURY DEMAND

25. Trial by Jury according to the Seventh Amendment known as the Bill of Rights DEMANDED HEREIN.

### Right to Amend:

Plaintiff herein reserves the right to Amend Complaint as needed.

Criminal Oath

WITNESS BY JUDICIAL OFFICER

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Steve Douglas, Gartin - the Common Law copyrighted freeman character

Before me, \_\_\_\_\_, A Judicial Officer for the United States prescribed by law with authority to administer oaths, appeared Steve Douglas, Gartin, who making himself known to me, did affirm and subscribe to the truth of the facts in this Complaint on this \_\_\_\_\_ day of \_\_\_\_\_, 1997.

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Judge

Pursuant to 28 U.S.C.A. 1746

(1) \_\_\_\_\_ and executed "without the United States," I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, to the best of my belief and informed knowledge.

Subscribed, sealed and affirmed to this \_\_\_\_\_ day of \_\_\_\_\_ 1997.

I hereby affix my own signature to all of the above affirmations with explicit reservation of ALL my unalienable rights and without prejudice to ANY of those rights pursuant to U.C.C. 1-207.

My signature, \_\_\_\_\_  
Citizen/Principal, by Special Appearance in Propria Persona,  
proceeding Sui Juris,  
with Assistance, Special, " Without Prejudice" to any of my  
unalienable rights.

## Attachment 1 ) Definitions

"person" defined.

In general usage, a human being, though by statute the term may include labor organizations, partnerships, associations, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers. Scope and delineation of term is necessary for determining those to whom Fourteenth Amendment of the Constitution affords protection since this Amendment expressly applies to "person." Black's Law 6th

"Whoever" includes all persons, agents, and employees; and all officials, public or private. An unincorporated voluntary association does not come within the meaning of the term, "whoever" in an ordinance providing that "whoever" violates certain provisions of the ordinance shall be deemed guilty of a misdemeanor; and such association cannot be convicted for offense- Bridgeport v. Eagles 97 O. App. 245, 56 0033, 125 NE2d 202.

Defendant Judges, each and every one of them and et al, in court rooms they themselves knowingly colored with an Executive Flag, pursuant to *Title 4 U.S.C.A. 1, Part II*, in a "Federal Agency", *1994 Act to Reorganize the Govt. 63 Statutes at Large, Chapter 288, Sec. 3(b)*, the term 'Federal Agency' means any executive agency or establishment in the legislative or Judicial branch of government, *Title 5, p.739 section 5721*. "Agency" means (C) a court of the United States;

took rights from Plaintiff herein, Plaintiff's rights and liberty, by means of illegal compulsion or oppressive exaction, compelling judgments on Plaintiff when Plaintiff was not named on legal process, by color of Defendant's office as Judicial Officer in conspiracy with Defendant Attorney 'a office as Officer of the Court in the same Bar Association shall be fined not more than \$5,000 or imprisoned not more than three years, or both.

"Color of Authority" defined. That semblance or presumption of authority sustaining the acts of a public officer which is derived from his apparent title to the office or from a writ or other process in his hands apparently valid and regular.

"Color" defined. An appearance, semblance, or simulacrum, as distinguished from that which is real. A prima facie or apparent right. Hence, a deceptive appearance; a plausible, assumed exterior, concealing a lack of reality; a disguise or pretext. Black's Law 6<sup>th</sup>

"Color of Office" defined. Pretense of official right to do act made by one who has no such right. An act under color of office is an act of an officer who claims authority to do the act

by reason of his office when the office does not confer on him any such authority.



Conspiracy-Title 42, §1983  
Knowledge- Title 42, §1986

Defendant Tamara Ann Gartin, nee Zehnder's wish to be divorced is the genesis of this conspiracy. Her contacts to U S West, the Lutheran Church MS and her intimate knowledge of Plaintiffs family and professional life allowed her to formulate a plan of action in order:

To accompany Markus Bernard Merritt and supporting him with financial substance from the sale or use of Plaintiffs' personal goods and possessions. The plan to steal Plaintiffs' goods by fraud and deceit was the formulation of Antonio Troy Ciccarelli, J. Terry Wiggins of Karsh & Fulton, P.C., Markus Bernard Merritt and the Zehnder Family.

To consolidate her position at U S West Legal Department and to cover the fact that she lied on her professional resume` in claiming computer and other skills that she did not have.

To cover the fact that Defendant Francisca Zehnder, her sister in law and supervisor at U S West and member of the Bethlehem Lutheran Church congregation, was fully knowledgeable about those lies, conspiring to defraud Plaintiff of his work and payment for same.

To escape further financial liability for the Spyderco/IRS action in Federal Court

To prevent the exposure of Zehnder Family Secrets; theft, homosexuality, adultery, child and spousal abuse. The posture of the Zehnder family as professional and commercial christians, in the employ of the Lutheran Church MS, would have been severely damaged with the exposure of the secrets.

Defendant U S West, Incorporated needed to sever its' relationship with Plaintiff and conspired in the actions with these motives:

To make a theft of services, to wit; Invoiced and Unpaid-for computer skills and services for the U S West Legal Department Staff; Supervisor Francisca Zehnder, Paula Anderson, Barbara Byres, Tamara Ann Gartin, Markus Bernard Merritt, Richard McCormick and others.

Unauthorized dissemination of confidential and privileged client and corporate information from the Staff of the Legal Department to Plaintiff by Supervisor Francisca Zehnder and Tamara Ann Gartin and such others.

To keep secret the false resume` presented to U S West which continues to serve Tamara Ann Gartin as a work credential.

Elizabeth Kioovsky, and in her position as Senior Counsel to U S West, has actively instigated and participated in a Conspiracy with Legal Department Staff Supervisor Francesca Zehnder, Richard McCormick, Paula Anderson, Barbara Byres, Tamara Ann Gartin, Markus Bernard Merritt and Bill Stevens to present perjury and falsified documents to Greenwood Village Police Department Technician Ewan Scouse in order to falsely portray Plaintiff as a menace and to obstruct justice.

To further the activities of Tamara Ann Gartin at the Bethlehem Church & School, Inc., and Francisca Zehnder, Paula Anderson, Beverly Byres; members of the Lutheran Church MS at Bethlehem Lutheran Church.

Defendant Bethlehem Lutheran Church & School and Defendants David Langewisch, Peter Woodward and Chet Shoaf conspired and in a meeting of minds to conceal the personal life of the Zehnder Family. The Zehnder Family is of National Prominence and any taint of scandal would affect the 'National Church' as well as Bethlehem Lutheran.

David Langewisch broke the confidentiality of the Marriage and Personal Counseling with Plaintiff and needed to hide that breach of ethics; conspiring with U S West Legal Department Supervisor Francisca Zehnder, Paula Anderson, Barbara Byres, Tamara Ann Gartin, Markus Bernard Merritt.

Senior Pastor Emeritus Robert V. Zehnder supported Tamara's position with finances and to hide his own affairs and abuse of his family.

The Zehnder Family wanted to keep secret the adultery of Tamara Ann Gartin with Markus Bernard Merritt from the Congregation, Pastor Robert V. Zehnder, Plaintiffs offspring and the National Church.

Karsh & Fulton, P.C.

Antonio Troy Ciccarelli is a member of the Bethlehem Lutheran Church Congregation. His relationship with the Senior Pastor Robert Zehnder, Delores Jean Lynn Zehnder and Tamara Ann Zehnder, was as Counsel for 'Tamara Ann Gartin'. He was assisting Markus Bernard Merritt in the unauthorized practice of law and to defraud the Zehnder Family of substance and goods.

J. Terry Wiggins was Antonio Troy Ciccarellis' leading Partner in Karsh & Fulton, P.C. and took on Ciccarellis' caseload when absence or vacations applied. J. Terry Wiggins was responsible for Ciccarellis' strategies and the conduct of his cases. Defendant Wiggins was intimately aware of the communications between Steve and Troy because the FAX machine is in his office. Wiggins is a well known fixer and former

prosecutor with broad connections into the County and Federal systems of Law Enforcement and the Judiciary. He has, on his own initiative; threatened a Witness on multiple occasions, stood in knowing contempt of the Courts orders, participated in the knowing submission of false and misleading documents and testimony to the Court, failed to supervise and correct a subordinate lawyer, failed to conduct himself in the manner to instill confidence in the integrity of his firm or his profession, improperly obstructed justice by failing to properly receive or give due diligence to communications and filings on behalf of his minor clients; April Rose Gartin and Elijah Rock Gartin and failed to rise to minimal and slight standards of professional conduct.

Alan Karsh has arrogated a personal participation by threatening to 'squash' Steve 'like a bug...I have the power' in support of blatantly unethical and improper acts by his partner, J. Terry Wiggins and his junior associate, Antonio Troy Ciccarelli, as well as the number of 'un-billable' hours required by Ciccarelli's promises to the Jefferson County Court. He has failed and given slight diligence to his responsibilities of supervision of subordinate lawyers; J. Terry Wiggins and Antonio Troy Ciccarelli.

Larry Fulton, Seymour Joseph and Fred Gabler have been contacted personally and repeatedly with notification of the active participation in the deprivation of Steves Rights by their Partner and Associate and Staff. They have failed and neglected to correct or prevent wrongs and deprivations.

Valerie Krogman has failed and neglected to

Daniel Manson has submitted false documents to the Court on behalf of K&F to further the Conspiracy and for money.

Golden Police Department Officer Michael D. Moler conspired with Antonio Troy Ciccarelli, Tamara Ann Gartin and Markus Bernard Merritt to:

Abduct and Kidnap two children

Establish a false persona of violence to counterattack Steves petition for a restraining order against Markus Bernard Merritt.

Arrest Steve to prevent

Golden Municipal Court Attorney William Hayashi joined in the conspiracy to limit the liability of the City of Golden and the Golden Recreation Center and the Golden Police Department and to conceal his own slight diligence to his responsibilities as an Officer of the Court.

Magistrate Ronald L. Miller joined in the conspiracy in order to limit the liability of the City of Golden and the Golden Recreation Center and the Golden Police Department and to conceal

his own slight diligence to his responsibilities to his sworn oath of office.

David J. Thomas, George Brauchler, Ted Maclenberg (sic) joined the conspiracy to limit the liability of the 18<sup>th</sup> Judicial District, Jefferson County, City of Golden, Jefferson County Sheriffs Department, Golden Police Department and to cover its' own slight diligence.

Henry E. Nieto, James C. Demlow, Roy G. Olsen, Marilyn E. Leonard and Charles T. Hoppin have joined the conspiracy in order to limit the liability of the 18<sup>th</sup> Judicial District, Jefferson County, Jefferson County Sheriffs' Department, Golden Magistrate Ronald L. Miller, William Hayashi, Mike Bestor, the City of Golden, Theresa Reilly, the Golden Police Department, the Golden Recreation Center and its staff and administration and their own slight diligence and slight performance to their positions of public trust and integrity.

The various clerks of the court and such staff have knowingly and maliciously obstructed justice and refused documents, diverted and delayed documents, and furthered the conspiracy by direct actions on behalf of their Judges and for commercial purposes.

Lynda Donnelly and James Hollaway have joined in the conspiracy and obstructed justice by failing to act or refusing to act or neglecting to act. They have consciously and deliberately acted improperly on behalf of the lawyers charged to them as before the Disciplinary Committee of the Supreme Court of the state of Colorado. They have repeatedly refused to accept information and evidence; delayed, diverted and concealed information and evidence in Court submissions, and failed or neglected to correct or prevent wrongs and deprivations or to provide equal protection of the law or of administrative relief to a non-lawyer citizen

Maurice Knaizer joined the conspiracy on behalf of Chief Judge Henry E. Nieto and to conceal the slight diligence and slight performance and to limit the liability of the state of Colorado, Jefferson County, et al.

Greg Peters and Darren Voss joined the conspiracy and the meeting of minds to curry favor with the Executives of U S West, Incorporated, the City of Greenwood Village, Lakewood Police Department, City of Littleton, Greenwood Village Police Department, Arapahoe County and the Arapahoe County Sheriffs Department and to attempt to limit the civil and criminal liability of same. Further, they seek to conceal and limit their own liability for frivolous and malicious actions against Steve.

They have failed and neglected to secure or to prevent or to correct wrongs and deprivations of rights of Steve. They have given slight diligence and slight performance to professional standards and ethical requirements of the legal profession.

The Administrative and Line Officers of the Internal Affairs Bureau (however named) of the Golden Police Department, Lakewood Police Department, Littleton Police Department, Jefferson County Sheriffs' Department have joined in the conspiracy and the meeting of minds to conceal the illegal actions or slight performance of their fellow officers. They have conspired to conceal their own slight diligence and failure to secure and to protect, to prevent and correct wrongs and deprivations of Rights of Steve.

The Officers and Administration of the Colorado Bureau of Investigation, the Douglas County Sheriffs Department, the Aurora Police Department, the Arvada Police Department have conspired and in a meeting of minds to obstruct justice, conceal the slight diligence and slight performance to professional standards of their fellow police officers, such officers of the court and judicial officers from public exposure and opprobrium.