

Charles Harry Clements
1741 Dallas Street
Aurora, Adams County
Colorado

Honorable Leland P. Anderson, District Court Judge
JEFFERSON COUNTY DISTRICT COURT: Div. 2
100 Jefferson County Parkway
Golden, Jefferson County
Colorado

Reference: Case No. 00CR3373
Colorado State Grand Jury Indictment: 00CR0001
Dismissal Order: 3 OCT 01

Date: 30 NOV 01

Your Honor;

This is in the nature of a Complaint of Criminal Charges stemming from the prosecution of the above numbered case by the Jefferson County District Attorney's Office and a Request for Investigation and subsequent prosecution of such charges.

I submit that yours is the Court of Jurisdiction, the matters were before you for adjudication, the crimes were committed in front of your Honor and in your Courtroom and are an affront to the peace, dignity and probity of your Honor and your honorable Court.

I am an adult, I tell the truth and I am the Proper Party Injured in this instant matter.

1. I submit as fact that Jefferson County Special Assistant District Attorney Marleen M. Langfield (Att'y Register Number 10355) knowingly and deliberately, willfully, wantonly, with malice, reckless of the law and contemptuous of the integrity of your court, filed seventeen (17) false and frivolous charges against me for prosecution in your Court. She did these actions under color of her authority; as an attorney, as a State Officer in the Attorney General's Office, and as a Special Prosecutor for the Jefferson County District Attorney's Office.

Each and every of the seventeen charges constituted a separate and distinct offense against my person, my family, my business and public reputation and dignity.

2. I believe, and on the basis of that belief allege, Special District Attorney (SDA) Marleen M. Langfield failed to adequately supervise her Investigatory Team and her Prosecutory Team and, moreover, led and directed them to do various improper acts which seem themselves actionable in nature. This would be to include Jefferson County Deputy Sheriff Don Estep, Investigator Gary Clyman, and such others unknown to me at

present, and them known as the 'Multi-Jurisdictional Domestic Terrorism TaskForce', so-called, and such others as will be discovered by diligent investigation.

3. Further; I believe, and on the basis of that belief allege, that Special District Attorney (SDA) Langfield deliberately and in a high knowledge of the law, withheld, secreted and concealed exculpatory evidence that would have precluded either the initial submission to a Grand Jury, the return of a True Bill Indictment, or the initial charging or the continued prosecution of those charges against me. SDA Langfield knew, or should have known through her investigatory team, that large amounts of legal and business materials had been confiscated, and are held or have been destroyed, by both law enforcement personnel and, improperly, by Attorney Glen R. Anstine II, Esq. and such exculpatory evidences were reserved and concealed from proper discovery and publication to the Honorable Court's attention.

4. Further; I believe, and on the basis of that belief allege, that SDA Langfield suborned material perjury before the Grand Jury from several Witnesses; Arabella T. Bonilla, Hector Bonilla, Victoria de Thouars-Tollman and such others, and proceeded with charges before your Honorable Court based on that perjury that she knew, or should have known, were utterly unfounded and untenable.

5. Further; I believe, and on the basis of that belief allege, that SDA Langfield has knowingly enabled the operation and continuing operation of a racketeering influenced criminal endeavour; to wit, the Bonilla Crime Family, in recompense for the perjured testimony of Arabella T. Bonilla, Hector Bonilla and the inclusion of information from Carlos Bonilla.

6. I believe, and on the basis of that belief allege, that SDA Langfield engaged in Witness Intimidation and Obstruction of Justice by charging me with these seventeen (17) unfounded and frivolous charges in the attempt to influence my testimony in regards another Defendant in her prosecution; Mr. Steve D. Gartin, both in the instant case against him and in the various actions taken, and contemplated to be taken, by Mr. Gartin in complaint for damages concerning previous abuse and denial of his civil rights.

7. I believe that SDA Langfield, knowingly and deliberately, negotiated in Bad Faith throughout my prosecution, as she knew, or should have known, that the seventeen charges lodged against me were utterly unfounded and no accusation had ever been made against me in those charges, save one, and that dismissed, after months of vigorous prosecution, in the interests of justice at the petition of the Jefferson County District Attorney's Office.

8. I believe that SDA Langfield gave orders for my arrest to be painful and humiliating, my confinement to be strait and my arraignment unnecessarily delayed past the statutory limit so as to debilitate me physically, deprive me of mental acuity, deny me exculpatory evidence, or give me access to knowing the charges laid against me, in order to prevent me from forming a knowing defense. SDA Langfield lied to me, and through her agents, about the status of availability of the Indictment, reserved any charging document for

weeks, threatened me with vigorous prosecution fullknowing that there was no accusation, no evidence of wrongdoing, no injured party and no valid interest by the State of Colorado in my activities or lack thereof.

9. I believe, and on the basis of that belief allege, that SDA Marleen M. Langfield, or those in her immediate supervision and at her direction, took confidential information from her investigation; to wit, my secret computer password authorizations, and destroyed my lawful businesses in order to deny me the fruits of those businesses; unlawfully, maliciously, vindictively, selectively, and in a high knowledge of the law. This Computer Crime is an egregious abuse of her special knowledge and serves no legal purpose, doesn't aid in any investigation and serves only to harm my family and myself.

10. SDA Marleen Langfield deliberately and knowingly misled the Grand Jury and your Honorable Court to believe that I am a 'Patriot', considered as a pejorative; to link me somehow with the Oklahoma City Bombing, the Columbine Massacre, aspects of 'Domestic Terrorism', the 'Christian Identity' movement, 'anti-government' political positions and other such calumnies so as to seem to add justification, credence and substance to her case.

No evidence exists for such an accusation, and in the light of the terrible terrorist acts to which we've all been subjected, the characterization is outrageous and shocks the conscience at the lack of integrity, sense of honor, professional/ethical conduct, and Langfield's shameful representation of the legal process and it's administrators.

SDA Marleen M. Langfield's outrageous conduct is shocking in it's impropriety and wanton and willful recklessness. I submit that an investigation at your instigation is warranted and that Criminal Charges will result from these improprieties and abuses by SDA Langfield and her associates and subordinates.

I make these charges with no intent to deceive or to mislead the Honorable Court and pray your Honor to initiate and expedite an investigation forthwith.

Respectfully submitted to your Honor;

Charles Harry Clements