

District Court, Rio Grande County, Colorado 925 6th Street, Room 204 Del Norte, CO 81132	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p>
<p><b>THE PEOPLE OF THE STATE OF COLORADO</b></p> <p>vs.</p> <p><b>JARED POLIS,</b> Defendant</p>	
Phil Weiser Attorney General, #38314 Office of the Attorney General of Colorado 1300 Broadway, 10th Floor Denver, CO 80203 Phone: 720-508-6000 Fax: 720-508-6030 Email: <a href="mailto:AG@COAG.gov">AG@COAG.gov</a>	Case No.:  Div:            Courtroom:
<b>VERIFIED COMPLAINT AND INFORMATION</b>	

CHARGES: 10

**COUNT 1: ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4){24051}**

**COUNT 2: CRIMINAL EXTORTION - UNLAWFUL ACT, C.R.S. 18-3-207(1)(a),(b)(I) (F4){02063}**

**COUNT 3: ACTING IN INJURIOUS MANNER TOWARD AT-RISK PERSON - CRIMINAL NEGLIGENCE, C.R.S.18-6.5-103(2)(a) (F6){00000}**

**COUNT 4: ISSUING A FALSE CERTIFICATE, C.R.S. 18-8-406 (F6){24122}**

**COUNT 5: UNAUTHORIZED PRACTICE OF MEDICINE WITHOUT A LICENSE, C.R.S. 12-240-135 (F6){00000}**

**COUNT 6: OFFICIAL OPPRESSION, C.R.S. 18-8-403 (M1){24091}**

**COUNT 7: FIRST DEGREE OFFICIAL MISCONDUCT, C.R.S. 18-8-404 (M1){24101}**

**COUNT 8: CHILD ABUSE - RECKLESSLY - WITH INJURY, C.R.S. 18-6-401 (M1){00000}**

**COUNT 9: MENACING, C.R.S. 18-3-206 (M1){02052}**

**COUNT 10: RECKLESS ENDANGERMENT, C.R.S. 18-3-208 (M2){02071}**

**CO-DEFENDANTS:**

**JILL HUNSAKER RYAN,**

Executive Director of the Colorado Department of Public Health and Environment

**EMILY BROWN,**

Director of Rio Grande County Public Health

**PAUL WERTZ,**

Interim Director of Rio Grande County Public Health

**TONI STEFFENS-STEWARD,**

Interim Director of Rio Grande County Public Health

**KOLAWOLE BANKOLE,**

Director of Rio Grande County Public Health

**NAME UNKNOWN # 1,**

**NAME UNKNOWN # 2,**

**NAME UNKNOWN # 3,**

**NAME UNKNOWN # 4,**

**NAME UNKNOWN # 5,**

**NAME UNKNOWN # 6,**

**NAME UNKNOWN # 7.**

Phil Weiser, Attorney General, of the State of Colorado, in the name of and by the authority of the People of the State of Colorado, informs the Court of the following offenses committed, or triable, in the County of Rio Grande.

COUNT 1 - ATTEMPT TO INFLUENCE A PUBLIC SERVANT (F4)

On or about March 22, 2020, and continuing thereafter, Defendant Polis unlawfully and feloniously attempted to influence Jill Hunsaker Ryan, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 2 - CRIMINAL EXTORTION - UNLAWFUL ACT (F4)

On or about March 22, 2020, and continuing thereafter, Defendant Polis unlawfully, feloniously, and with the intent to induce the victim(s) identified in the attached Supporting Affidavit against their will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain or cause economic hardship to the person(s) identified in the attached Supporting Affidavit, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

COUNT 3 - ACTING IN INJURIOUS MANNER TOWARD AT-RISK PERSON - CRIMINAL NEGLIGENCE (F6)

On or about April 26, 2020, and continuing thereafter, Defendant Polis unlawfully and feloniously acted in a manner likely to be injurious to the physical/mental welfare of the victim(s) identified in the attached Supporting Affidavit, an at-risk person(s), to wit: criminal negligence as defined in 18-1-501(3), C.R.S. resulting in bodily injury to an at-risk person; in violation of section 18-6.5-103(2)(a), C.R.S.

COUNT 4 - ISSUING A FALSE CERTIFICATE (F6)

On or about March 22, 2020, and continuing thereafter, Defendant Polis, a public servant authorized by law to make and issue official certificates or other official written instruments, unlawfully and feloniously made and issued an instrument, namely: Executive Order D 2020 013 dated March 22, 2020 and other 2020 D series Executive Orders issued by defendant on various dates, that contained a statement which he knew to be false; in violation of section 18-8-406, C.R.S.

COUNT 5 - UNAUTHORIZED PRACTICE OF MEDICINE WITHOUT A LICENSE (F6)

On or about April 26, 2020, and continuing thereafter, Defendant Polis, unlawfully and feloniously engaged in the practice of medicine without a license as defined in section 12-240-107(1)(a), C.R.S. or 12-240-107(1)(b), C.R.S. and 12-240-107(2), C.R.S.; in violation of section 12-240-135, C.R.S.

COUNT 6 - OFFICIAL OPPRESSION (M1)

On or about March 22, 2020, and continuing thereafter, Defendant Polis, a public servant, while acting or purporting to act in an official capacity or taking advantage of the actual or purported capacity, and with actual knowledge that the conduct was illegal, unlawfully subjected another to arrest, detention, search, seizure, mistreatment, dispossession, assessment, or lien; in violation of section 18-8-403, C.R.S.

COUNT 7 - FIRST DEGREE OFFICIAL MISCONDUCT (M1)

On or about March 22, 2020, and continuing thereafter, Defendant Polis, a public servant, with intent to obtain a benefit for any person or maliciously cause harm to another, unlawfully and knowingly committed an act relating to his office but constituting an unauthorized exercise of his official function; in violation of section 18-8-404, C.R.S.

COUNT 8 - CHILD ABUSE - RECKLESSLY - WITH INJURY (M1)

On or about April 26, 2020, and continuing thereafter, Defendant Polis unlawfully and recklessly caused injury to the life and health of the child(ren) identified in the attached Supporting Affidavit, a person under 16 years of age; in violation of section 18-6-401, C.R.S.

COUNT 9 - MENACING (M1)

On or about April 26, 2020, and continuing thereafter, Defendant Polis, by any threat or physical action, unlawfully and knowingly placed or attempted to place the victim(s) identified in the attached Supporting Affidavit in fear of imminent serious bodily injury; in violation of section 18-3-206, C.R.S.

Remainder of page intentionally left blank.

COUNT 10 - RECKLESS ENDANGERMENT (M2)

On or about April 26, 2020, and continuing thereafter, Defendant Polis unlawfully and recklessly engaged in conduct which created a substantial risk of serious bodily injury to the victim(s) identified in the attached Supporting Affidavit; in violation of section 18-3-208, C.R.S.

All offenses against the peace and dignity of the People of the State of Colorado.

Phil Weiser

Attorney General, #38314

\_\_\_\_\_ Date: \_\_\_\_\_

Remainder of page intentionally left blank.

**Verification and Acknowledgment  
of Criminal Complainant**

I, Stanley Charles Thorne, swear under oath, that I have read the foregoing Criminal Complaint to which this Verification and Acknowledgment is attached, and that the statements of fact set forth therein are true and correct to the best of my knowledge.

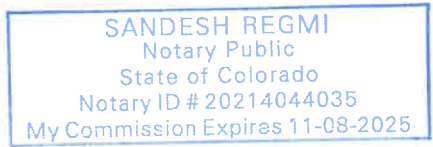
Stanley Charles Thorne  
Printed name

*[Handwritten Signature]*  
Signature

11-08-2022  
1:32 pm  
Mountain time  
Date

Subscribed and affirmed or sworn to before me in the County of Arapahoe,  
State of Colorado, this 8th day of November, 2022.

*[Handwritten Signature]*  
Notary Public



My Commission Expires: 11/08/2025

**Probable Cause Affidavit  
in Support of Criminal Complaint**

I, Stanley Charles Thorne, a credible person competent to testify in this case, being duly first sworn according to law, hereby declare under penalty of perjury and based on reasonable belief, that:

I am filing this Probable Cause Affidavit in support of the Complaint and Information to which this Probable Cause Affidavit is attached, in good faith as required under Colorado law to report or disclose suspected crime(s) to law enforcement authorities, and I understand that I am immune from civil liability for such good faith report or disclosure, 18-1-115, C.R.S.;

I have personal knowledge of the events and matters set forth in the Complaint and Information to which this Probable Cause Affidavit is attached;

each of the statements of fact in the Complaint and Information to which this Probable Cause Affidavit is attached is true and correct to the best of my knowledge and belief; and

I have probable cause to believe that:

the named Defendant, Jared Polis, committed the offenses charged in the Complaint and Information to which this Probable Cause Affidavit is attached;


the named Co-Defendants committed some or all of the same offenses charged in the Complaint and Information to which this Probable Cause Affidavit is attached;

various other Co-Defendants whose names are unknown to Complainant, but whose titles are known (such as County Commissioner, District School Board Member, District School Superintendent, and other government officials and private persons and corporations) committed some or all of the same offenses charged in the Complaint and Information to which this Probable Cause Affidavit is attached; and

individually or collectively, they caused injuries to me and/or a person or persons known to me; against the peace and dignity of the People of the State of Colorado.

FURTHER, AFFIANT SAYETH NOT.

11.08.2022  
1:32 pm  
*Mountain time*



Signature of Affiant/Complainant

Subscribed and affirmed or sworn to before me in the County of Arapahoe, State of Colorado, this 8<sup>th</sup> day of Nov., 2022.

Regmi  
\_\_\_\_\_  
Notary Public

My Commission Expires: 11/08/2025

SANDESH REGMI  
Notary Public  
State of Colorado  
Notary ID # 20214044035  
My Commission Expires 11-08-2025

**Witness Affidavit  
in Support of Criminal Complaint**

I, \_\_\_\_\_, a credible person competent to testify in this case, being duly first sworn according to law, hereby declare under penalty of perjury and based on reasonable belief, that:

I am filing this Witness Affidavit in support of the Complaint and Information to which this Witness Affidavit is attached, in good faith as required under Colorado law to report or disclose suspected crime(s) to law enforcement authorities, and I understand that I am immune from civil liability for such good faith report or disclosure, 18-1-115, C.R.S.;

I have personal knowledge of the events and matters set forth in the Complaint and Information to which this Witness Affidavit is attached;

each of the statements of fact in the Complaint and Information to which this Witness Affidavit is attached is true and correct to the best of my knowledge and belief; and

I have probable cause to believe that:

the named Defendant, Jared Polis, committed the offenses charged in the Complaint and Information to which this Witness Affidavit is attached;

the named Co-Defendants committed some or all of the same offenses charged in the Complaint and Information to which this Witness Affidavit is attached;

various other Co-Defendants whose names are unknown to Affiant, but whose titles are known (such as County Commissioner, District School Board Member, District School Superintendent, and other government officials and private persons and corporations) committed some or all of the same offenses charged in the Complaint and Information to which this Witness Affidavit is attached; and

individually or collectively, they caused injuries to me and/or a person or persons known to me; against the peace and dignity of the People of the State of Colorado.

FURTHER, AFFIANT SAYETH NOT.

\_\_\_\_\_  
Signature of Affiant/Witness

Subscribed and affirmed or sworn to before me in the County of \_\_\_\_\_, State of \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_