District Court, Douglas County, Colorado	DATE FILED: May 14, 2019 5:36 PM				
Douglas Combined Courts					
4000 Justice Way					
Castle Rock, CO 80109					
THE PEOPLE OF THE STATE OF COLORADO					
vs.	<u> </u>				
DEVON MICHAEL ERICKSON,					
Defendant	$\Box$ COURT USE ONLY $\Box$				
George H. Brauchler					
District Attorney, # 25910					
Office Of The District Attorney	Case No: D0182019CR000451				
Eighteenth Judicial District					
4000 Justice Way, Suite 2525 A					
Castle Rock, CO 80109	Div: 1 Courtroom:				
Phone Number: 720-733-4500					
Fax: 720-733-4689					
COMPLAINT AND INFORMATION					

#### **CHARGES: 48**

**COUNT 1: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a) (F1){01011}** 

**COUNT 2: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d) (F1){01015}** 

COUNT 3: CONSPIRACY TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-201 (F2){01011C}

COUNT 4: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}

COUNT 5: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}

COUNT 6: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}

COUNT 7: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}

CO-DEFENDANT: D0182019CR000467 -

COUNT 8: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}

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- COUNT 9: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a);18-2-101 (F2){01011A}
- COUNT 10: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 11: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 12: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 13: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 14: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 15: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 16: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 17: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 18: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 19: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 20: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 21: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}
- COUNT 22: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d):18-2-101 (F2){01015A}
- COUNT 23: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d):18-2-101 (F2){01015A}

COUNT 24: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

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COUNT 25: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 26: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 27: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 28: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 29: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 30: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 31: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 32: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 33: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 34: CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(d);18-2-101 (F2){01015A}

COUNT 35: SECOND DEGREE ARSON, C.R.S. 18-4-103(1) (F4){05021}

COUNT 36: PROVIDING OR PERMITTING A JUVENILE TO POSSESS A HANDGUN, C.R.S. 18-12-108.7 (F4){30077}

COUNT 37: THIRD DEGREE BURGLARY, C.R.S. 18-4-204(1) (F5){06041}

COUNT 38: CONSPIRACY TO COMMIT SECOND DEGREE ARSON, C.R.S. 18-4-103(1);18-2-201 (F5){05021C}

COUNT 39: THEFT, C.R.S. 18-4-401(1),(2)(f) (F6){08A13}

COUNT 40: POSSESSION OF A WEAPON ON SCHOOL GROUNDS, C.R.S. 18-12-105.5 (F6){30049}

COUNT 41: CRIMINAL MISCHIEF, C.R.S. 18-4-501(1),(4)(d) (F6){0901J}

COUNT 42: CONSPIRACY TO COMMIT CRIMINAL MISCHIEF, C.R.S. 18-4-501(1),(4)(d);18-2-201 (F6){0901JC}

COUNT 43: CONSPIRACY TO COMMIT THEFT, C.R.S. 18-4-401(1),(2)(f);18-2-201 (F6){08A13C}

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COUNT 44: CONSPIRACY TO COMMIT THIRD DEGREE BURGLARY, C.R.S. 18-4-204(1);18-2-201 (F6){06041C}

COUNT 45: INTERFERENCE WITH STAFF, FACULTY, OR STUDENTS OF EDUCATIONAL INSTITUTIONS, C.R.S. 18-9-109(2) (M3){27082}

COUNT 46: RECKLESS ENDANGERMENT, C.R.S. 18-3-208 (M3){02071}

COUNT 47: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(B) (SE){36092}

COUNT 48: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

George H. Brauchler, District Attorney for the Eighteenth Judicial District, of the State of Colorado, in the name 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 Douglas:

Case No.: D0182019CR000451

### **COUNT 1-MURDER IN THE FIRST DEGREE (F1)**

On or about May 7, 2019, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, caused the death of the

### **COUNT 2-MURDER IN THE FIRST DEGREE (F1)**

On or about May 7, 2019, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby caused the death of the invitation of section 18-3-102(1)(d), C.R.S.

### COUNT 3-CONSPIRACY TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, Devon Michael Erickson, with the intent to promote or facilitate the commission of the crime of murder in the first degree, unlawfully and feloniously agreed with that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-3-102(1)(a) and 18-2-201, C.R.S.

# COUNT 4-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of 3-102(1)(a) and 18-2-101, C.R.S.

# COUNT 5-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of in violation of sections 18-3-102(1)(a) and 18-2-101, C.R.S.

# COUNT 6-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of in violation of sections 18-3-102(1)(a) and 18-2-101, C.R.S.

# COUNT 7-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of the intent to cause the de

# COUNT 8-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of the person of the pe

# COUNT 9-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of sections 18-3-102(1)(a) and 18-2-101, C.R.S.

# COUNT 10-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of time in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 11-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of time in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 12-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the value of human life generally in the value of human l

# COUNT 13-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of th

# COUNT 14-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 15-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 16-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the persons of the persons of the section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 17-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the persons of the persons of the section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 18-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of time in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 19-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of ; in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 20-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the persons o

# COUNT 21-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of ; in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 22-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of time in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 23-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 24-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of the persons of the persons of the section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 25-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of th

# COUNT 26-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of to persons of the persons of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 27-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 28-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of th

# COUNT 29-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 30-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 31-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of ; in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

## COUNT 32-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of th

# COUNT 33-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of ; in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

# COUNT 34-CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE (F2)

Case No.: D0182019CR000451

On or about May 7, 2019, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, Devon Michael Erickson unlawfully and feloniously, under circumstances evidencing an attitude of universal malice manifesting extreme indifference to the value of human life generally, knowingly engaged in conduct which created a grave risk of death to persons other than himself, and thereby attempted to cause the death of ; in violation of section 18-3-102(1)(d) and 18-2-101, C.R.S.

#### **COUNT 35-SECOND DEGREE ARSON (F4)**

On or about May 7, 2019, Devon Michael Erickson unlawfully, feloniously, and knowingly set fire to, burned, or caused to be burned the property of without the consent of the victim, the damage being one hundred dollars or more; in violation of section 18-4-103(1), C.R.S.

## COUNT 36-PROVIDING OR PERMITTING A JUVENILE TO POSSESS A HANDGUN (F4)

On or about May 7, 2019, Devon Michael Erickson unlawfully, feloniously, intentionally, knowingly, or recklessly provided a handgun to unlawfully possessed a handgun, failed to make reasonable efforts to prevent the possession; in violation of section 18-12-108.7, C.R.S.

#### **COUNT 37-THIRD DEGREE BURGLARY (F5)**

On or about May 7, 2019, Devon Michael Erickson unlawfully and feloniously entered or broke into a vault, safe, cash register, coin vending machine, product dispenser, money depository, safety deposit box, coin telephone, coin box, or other apparatus or equipment belonging to with the intent to commit the crime of Theft; in violation of section 18-4-204(1), C.R.S.

### COUNT 38-CONSPIRACY TO COMMIT SECOND DEGREE ARSON (F5)

On or about May 7, 2019, Devon Michael Erickson, with the intent to promote or facilitate the commission of the crime of second degree arson, unlawfully and feloniously agreed with that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-103(1) and 18-2-201, C.R.S.

#### COUNT 39-THEFT (F6)

Case No.: D0182019CR000451

On or about May 7, 2019, Devon Michael Erickson unlawfully, feloniously, and knowingly, took a thing of value, namely: firearms, of with the value of two thousand dollars or more but less than five thousand dollars; in violation of section 18-4-401(1),(2)(f), (6) C.R.S.

#### COUNT 40-POSSESSION OF A WEAPON ON SCHOOL GROUNDS (F6)

On or about May 7, 2019, Devon Michael Erickson unlawfully, feloniously and knowingly carried, brought, or had in his possession a deadly weapon, namely: handguns and a rifle, in or on the real estate and all improvements erected thereon of a public or private school, namely: STEM School Highlands Ranch; in violation of section 18-12-105.5, C.R.S.

#### **COUNT 41-CRIMINAL MISCHIEF (F6)**

On or about May 7, 2019, Devon Michael Erickson, in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of the aggregate damage being one thousand dollars or more but less than five thousand dollars; in violation of section 18-4-501(1),(4)(d), C.R.S.

### **COUNT 42-CONSPIRACY TO COMMIT CRIMINAL MISCHIEF (F6)**

On or about May 7, 2019, Devon Michael Erickson, with the intent to promote or facilitate the commission of the crime of criminal mischief, unlawfully and feloniously agreed with that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-501(1),(4)(d) and 18-2-201, C.R.S.

#### **COUNT 43-CONSPIRACY TO COMMIT THEFT (F6)**

On or about May 7, 2019, Devon Michael Erickson, with the intent to promote or facilitate the commission of the crime of theft, unlawfully and feloniously agreed with that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was two thousand dollars or more but less than five thousand dollars; in violation of sections 18-4-401(1),(2)(f) and 18-2-201, C.R.S.

### COUNT 44-CONSPIRACY TO COMMIT THIRD DEGREE BURGLARY (F6)

Case No.: D0182019CR000451

On or about May 7, 2019, Devon Michael Erickson, with the intent to promote or facilitate the commission of the crime of third degree burglary, unlawfully and feloniously agreed with that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-204(1) and 18-2-201, C.R.S.

### COUNT 45-INTERFERENCE WITH STAFF, FACULTY, OR STUDENTS OF EDUCATIONAL INSTITUTIONS (M3)

On or about May 7, 2019, Devon Michael Erickson, on the premises of an educational institution or at or in any building or other facility being used by an educational institution, unlawfully and willfully impeded the staff or faculty of the institution in the lawful performance of their duties or impeded a student of the institution in the lawful pursuit of his or her educational activities through the use of restraint, abduction, coercion, or intimidation or when force and violence were present or threatened; in violation of section 18-9-109(2), C.R.S.

### COUNT 46-RECKLESS ENDANGERMENT (M3)

On or about May 7, 2019, Devon Michael Erickson unlawfully and recklessly engaged in conduct which created a substantial risk of serious bodily injury to students and staff present at STEM School Highlands Ranch; in violation of section 18-3-208, C.R.S.

#### **COUNT 47-CRIME OF VIOLENCE (SE)**

On or about May 7, 2019, Devon Michael Erickson, during the commission, attempted commission of, conspiracy to commit, or immediate flight from the crimes of First Degree Murder and Attempted First Degree Murder, as charged in counts One through Thirty-Four, unlawfully caused serious bodily injury to and/or the death of

persons not a participant in the crime; in violation of section 18-1.3-406(2)(a)(I)(B), C.R.S.

#### **COUNT 48-CRIME OF VIOLENCE (SE)**

On or about May 7, 2019, Devon Michael Erickson unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: a firearm, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offenses of First Degree Murder and Attempted First Degree Murder, as charged in counts One through Thirty-Four; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

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

Case No.: D0182019CR000451

George H. Brauchler District Attorney, #: 25910

By: <u>/s/ Jason Siers</u> Date: <u>5/14/2019</u>

Jason Siers #: 28835

Senior Chief Deputy District Attorney

#### **ENDORSED WITNESS LIST**

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Jason Cirbo
Douglas County Sheriff
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Aaron Coleman Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Randy Allen Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Karissa L Russell Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Daniel Seaman Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Scott Bird Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Michael Trindle Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Kevan Carlson Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Melissa Williamson Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

John Edelmann Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Dean Deluca Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Amanda Falkner Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Michelle Herring Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Jennifer Rose Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Joel White Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Charles Erickson Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Aaron Lemaster Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Grant Perkins
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Matt Talmon Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Case No.: D0182019CR000451

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Jason Weaver Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Lionel Kahan Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Kevin Duffy Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Michael Kluth Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Cesar Madrigal Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Joe Pollack Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Zach Romberger Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Cleveland Holmes Parker Police Department 18600 Lincoln Meadows Pkwy Parker, CO 80134

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Bryan Ward Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Jan Martin
Douglas County Sheriff
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Chris Stadler Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Case No.: D0182019CR000451

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Timothy Van Noordt Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Douglas County Sheriff
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Case No.: D0182019CR000451

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B Eich Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

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Christopher Buehler Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Gabriella Horvath Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Case No.: D0182019CR000451

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Troy Bozarth Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Troy Croswhite
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Rick Kiesow Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Andi Marie Smith Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Michael Heidinger Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Brian Murphy Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Case No.: D0182019CR000451

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Lori Bronner
Douglas County Sheriff
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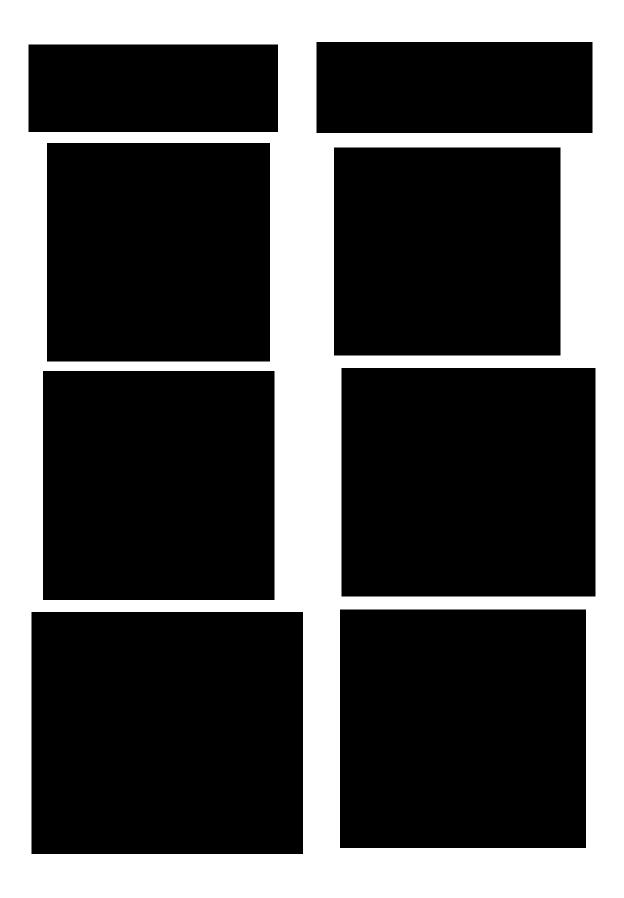
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Theresa Rhinehart Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

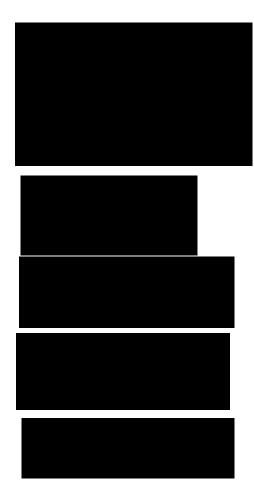
Vonelle Riley Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Phillip Webster Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Joshua Moseley Michael Joachim Douglas County Sheriff **Douglas County Sheriff** 4000 Justice Way #2658 4000 Justice Way #2658 Castle Rock, CO 80109-7547 Castle Rock, CO 80109-7547 Nick Lobello **Douglas County Coroners Office** 4000 Justice Way Castle Rock, CO 80109

Case No.: D0182019CR000451



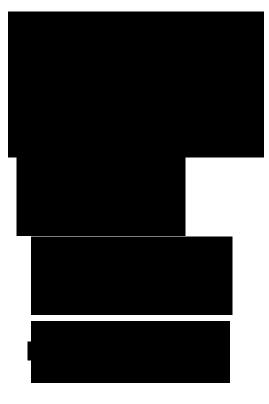
Case No.: D0182019CR000451



Jad Lanigan Aurora Police Department 15001 E Alameda Parkway Aurora, CO 80012

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Case No.: D0182019CR000451

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Case No.: D0182019CR000451

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Michael D Dickson Arapahoe County District Atty Office 6450 S Revere Parkway Centennial, CO 80111

Case No.: D0182019CR000451

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Philip Mcnairy Castle Rock Police Department 100 Perry Street Castle Rock, CO 80104

Paul Rodrigue Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

Marc Werder Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547

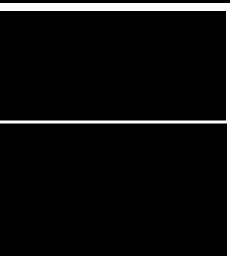
Paul Smith
Castle Rock Police Department
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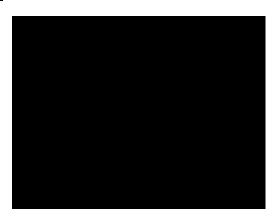
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Jay Norejko Rocky Mountain Regional Computer Lab 9195 E Mineral Ave Suite 300 Centennial, CO 80112



Glenn Peitzmeier Douglas County Sheriff 4000 Justice Way #2658 Castle Rock, CO 80109-7547





### **DEFENDANT INFORMATION**

DOB: <u>9/21/2000</u>					
Race: W	Gender: M				
Height: <u>505</u>	Weight: <u>95</u>	Hair: <u>SDY</u>	Eye: <u>BRO</u>		
Birthplace:		Tattoo:			
Address:  HIGHLANDS RANCH, CO 80129					
Home Phone #: _ Work Phone #:					
CASE INFORMATION					
Arresting Agency: <u>Douglas County Sheriff</u>					
Arresting ORI: CO0180000 Other Number:					
Offense Agency: <u>Douglas County Sheriff</u>					

Offense ORI: <u>CO0180000</u>

Arrest #: 19003016 Agency Case #: 2019-00054248

Date of Arrest: 05/07/2019 BAC: \_\_\_\_\_

CCIC#: \_\_\_\_\_ NCIC #: SID#: