

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: April 6, 2022 1:27 PM FILING ID: 379D7FF3EDDA3 CASE NUMBER: 2022CR34</p>
<p>PEOPLE OF THE STATE OF COLORADO,</p> <p>Plaintiff,</p> <p>v.</p> <p><b>BRETT ANDREW NELSON, DOB 09/03/79,</b></p> <p>Defendant.</p>	<p>▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General CRYSTAL LITTRELL, Senior Assistant Attorney General 1300 Broadway, 9<sup>th</sup> Floor Denver, CO 80203 720-508-6000 Registration Number: 36814</p>	<p>Case No.: GJ Case No.: 21CR0001  Ctrm: 259</p>
<p align="center"><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

**CHARGES:**

- COUNT ONE:** CRIMINAL EXTORTION, C.R.S. § 18-3-207(1)(a),(b)(1) (F4) {**02063**} (As to Judge Keri Yoder and Lori Talbot)
- COUNT TWO:** CONSPIRACY TO COMMIT CRIMINAL EXTORTION C.R.S. §§ 18-3-207(1)(a),(b)(1); 18-2-101 (F5) {**02063C**} (As to Judge Keri Yoder and Lori Talbot)
- COUNT THREE:** RETALIATION AGAINST A JUDGE, C.R.S. § 18-8-615 (F4) {**26074**} (As to Judge Keri Yoder)
- COUNT FOUR:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. § 18-8-306 (F4) {**24051**} (As to Judge Keri Yoder)
- COUNT FIVE:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {**10121**} (As to Gunnison County instruments: Judge

Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot)

**COUNT SIX:** CONSPIRACY TO COMMIT OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. §§ 18-5-114(1), 18-2-201 (F6) {10121C} (As to Gunnison County instruments: Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot)

**COUNT SEVEN:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {1001C} (As to Gunnison County instruments: Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot)

**COUNT EIGHT:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {10121} (As to Alamosa County instruments: Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot)

**COUNT NINE:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {1001C} (As to Alamosa County instruments: Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot)

**COUNT TEN:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {10121} (As to Montrose County and San Miguel County instruments: Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot)

**COUNT ELEVEN:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {1001C} (As to Montrose County and San Miguel County instruments: Judge Keri Yoder, Judge Ashley

Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot)

**COUNT TWELVE:** CRIMINAL EXTORTION, C.R.S. § 18-3-207(1)(a),(b)(1) (F4) {**02063**} (As to Judge Daniel Walzl)

**COUNT THIRTEEN:** CONSPIRACY TO COMMIT CRIMINAL EXTORTION C.R.S. §§ 18-3-207(1)(a),(b)(1); 18-2-101 (F5) {**02063C**} (As to Judge Daniel Walzl)

**COUNT FOURTEEN:** RETALIATION AGAINST A JUDGE, C.R.S. § 18-8-615 (F4) {**26074**} (As to Judge Daniel Walzl)

**COUNT FIFTEEN:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. § 18-8-306 (F4) {**24051**} (As to Judge Daniel Walzl)

**COUNT SIXTEEN:** STALKING – THREAT – COMMUNICATE, C.R.S. § 18-3-602(1)(b) (F5) {**03092**} (As to Judge Daniel Walzl)

**COUNT SEVENTEEN:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {**10121**} (As to Saguache County and Alamosa County instruments: Judge Daniel Walzl)

**COUNT EIGHTEEN:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {**1001C**} (As to Saguache County and Alamosa County instruments: Judge Daniel Walzl)

**COUNT NINETEEN:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {**10121**} (As to Gunnison County instruments: Christopher Danos, Rodney Morrill, Sarah Katherine Rais (Hindes), Wesley Hersberger, Craig Isham, Holly King (Hedstrom), Rosana Fonseca-Elias, Gregory Haase, Kathy Norgard, Nancy Church, and Will Shoemaker).

**COUNT TWENTY:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {**1001C**}

(As to Gunnison County instruments: Christopher Danos, Rodney Morrill, Sarah Katherine Rais (Hindes), Wesley Hersberger, Craig Isham, Holly King (Hedstrom), Rosana Fonseca-Elias, Gregory Haase, Kathy Norgard, Nancy Church, and Will Shoemaker).

**COUNT TWENTY-ONE:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {10121} (As to Alamosa County instruments: Billy Salazar, James Chavez, Jason Chacon, Keith Stambaugh, Judge Daniel Walzl, and Kelsey Waldorf).

**COUNT TWENTY-TWO:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {1001C} (As to Alamosa County instruments: Billy Salazar, James Chavez, Jason Chacon, Keith Stambaugh, Judge Daniel Walzl, and Kelsey Waldorf).

**COUNT TWENTY-THREE:** OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE, C.R.S. § 18-5-114(1) (F5) {10121} (As to Saguache County instruments: Joshua Dougherty, Jessica Waggoner, Jason Kelly, Sarah Katherine Rais (Hindes), Rodney Morrill, Christopher Danos, and Wesley Hersberger).

**COUNT TWENTY-FOUR:** FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. § 18-5-102(1)(C) (F5) {1001C} (As to Saguache County instruments: Joshua Dougherty, Jessica Waggoner, Jason Kelly, Sarah Katherine Rais (Hindes), Rodney Morrill, Christopher Danos, and Wesley Hersberger).

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<p>PHILIP J. WEISER, Attorney General CRYSTAL LITRELL, Senior Assistant Attorney General 1300 Broadway, 9<sup>th</sup> Floor Denver, CO 80203 720-508-6702 Registration Number: 36814</p>	<p>Case No.: GJ Case No.: 21CR0001</p> <p>Ctrm: 259</p>
<p><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

Of the 2021-2022 term of the Denver District Court in the year 2022; the 2021-2022 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

**ESSENTIAL FACTS**

1. Brett Andrew “Drew” Nelson, DOB 09/03/79 (“NELSON”) is a Colorado resident who resides in Gunnison County, Colorado.
  
2. The Statewide Grand Jury obtained evidence and the record supports that over the course of approximately two years, NELSON filed multiple fraudulent documents, including powers of attorneys and default judgments against a variety of individuals including public officials such as judges and prosecutors, as well as victims and law enforcement officers associated with criminal cases in which he was charged as a defendant.

3. The record shows that on May 21, 2018, NELSON filed a document titled, "Lawful claim of title, will, execution of will, declaration of status and appointment and standing orders for the trustees" (hereafter, "Lawful Claim") with the Alamosa County Clerk and Recorder's Office.

4. This document purports to be a will for NELSON. In it, NELSON identifies many entities/persons as "trustees" of his "estate" including "The United States of America," "The State of Colorado," "All Sheriffs," and "All Courts." The document asserts that NELSON's freedom is a fundamental right of his "estate." The "trustees" are barred from taking any action against NELSON's estate, unless granted permission by NELSON. Actions against NELSON's estate imply any arrest, court proceeding, or legal process NELSON does not agree to. The document purportedly entitles NELSON to monetary compensation from the "trustees" if any violations occur.

5. A "WARNING!" concludes the document, indicating that "any appointed trustee(s)" who "fails to follow the orders stated" could be "prosecuted in a court of record as common law theft punishable by DEATH." It is signed by NELSON.

6. The record further shows that NELSON filed an amended version of the Lawful Claim document with the Alamosa County Clerk and Recorder's office on September 25, 2019. This amended document is similar to the Lawful Claim filed in May 2018, but adds other entities as "trustees," including "All Police Departments," and removes the warning of death. It is also signed by NELSON.

7. The Alamosa County Clerk and Recorder's Office is located at 8999 Independence Way, Ste. 101, Alamosa (Alamosa County), CO 81101. The Alamosa Combined Court, Court Clerk's Office is located at 8955 Independence Way, Alamosa (Alamosa County), CO 81101.

8. In addition, the record reflects that NELSON used the Lawful Claim document in order to obtain fraudulent arbitration awards against multiple judges and individuals, which he filed in Gunnison, Montrose, and San Miguel Counties in order to collect alleged monetary damages.

9. Evidence was developed and the record reveals that in November 2019, NELSON paid a company called Sitcomm Arbitration Association five hundred dollars (\$500.00). In return, Sitcomm provided fictitious arbitration awards to NELSON for monetary damages against respondents Judge Keri Yoder,

Lori Talbot, Judge Ashley Burgemeister, and Judge Donald Jackson for alleged breach of contract and default judgment related to his Lawful Claim documents.

10. The record reveals that on January 3, 2020, NELSON filed a Final Arbitration Award that he received from Sitcomm with the Montrose County Clerk & Recorder's Office, alleging that Judge Keri Yoder, Lori Talbot, Judge Ashley Burgemeister, and Judge Donald Jackson were his trustees and owed him a contractual duty to protect his "estate." The Arbitration Award alleges that this contractual duty was breached when the respondents did not protect his "estate," thus triggering an arbitration clause. The Arbitration Award indicates Sitcomm had arranged an out of state arbitration hearing on respondents' alleged breach of contract. Respondents were not provided notice of and did not attend the alleged hearing. The Arbitration Award claimed respondents were in default and owed NELSON five hundred thousand dollars (\$500,000.00) each in monetary damages.

11. The record further reveals that NELSON filed Final Arbitration Awards against Judge Keri Yoder, Lori Talbot, Judge Ashley Burgemeister, and Judge Donald Jackson with the San Miguel County Clerk and Recorder's Office on September 25, 2020, and with the Gunnison County Clerk and Recorder's Office on September 14, 2020.

12. The Gunnison County Clerk and Recorder's Office is located at 221 N. Wisconsin St., Gunnison, (Gunnison County), CO 81230. The Gunnison County Combined Courts, Court Clerk's Office is located at 200 E. Virginia Ave., Gunnison, (Gunnison County), CO 81230.

13. The San Miguel County Clerk and Recorder's office is located at 305 W. Colorado Ave., Telluride, (San Miguel County), CO 81435

14. Judge Keri Yoder, Lori Talbot, Judge Ashley Burgemeister, and Judge Donald Corwin Jackson confirmed that they never entered into any contractual agreements with NELSON, let alone any agreements that included an arbitration clause.

**I. JUDGE KERI YODER, JUDGE DONALD CORWIN JACKSON,  
JUDGE ASHLEY BURGEMEISTER, AND LORI TALBOT**

**COUNT ONE**

**CRIMINAL EXTORTION**

**C.R.S. § 18-3-207(1)(a),(b)(1) (F4)**

On or about and between October 2, 2019 and July 6, 2021, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with the intent to induce Judge Keri Yoder and Lori Talbot, against his or her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Judge Keri Yoder and Lori Talbot, 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 TWO**

**CONSPIRACY TO COMMIT CRIMINAL EXTORTION**

**C.R.S. §§ 18-3-207(1)(a),(b)(1); 18-2-101 (F5)**

On or about and between October 9, 2019 and July 6, 2021, in and triable in the State of Colorado, BRETT ANDREW NELSON with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with Victoria Clark, and persons or entities unknown to the Statewide Grand Jury and the prosecution, that one or more of them would engage in conduct that constituted that crime or an attempt to commit that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-3-2017 and 18-2-101, C.R.S.

**COUNT THREE**

**RETALIATION AGAINST A JUDGE**

**C.R.S. § 18-8-615 (F4)**

On or about and between October 2, 2019 and September 25, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and knowingly, as retaliation or retribution against Judge Keri Yoder, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting, made a credible threat or committed an act of harm or injury upon a person or property



against or upon Judge Keri Yoder, the judge; in violation of section 18-8-615, C.R.S.

**COUNT FOUR**  
ATTEMPT TO INFLUENCE A PUBLIC SERVANT  
C.R.S. § 18-8-306 (F4)

On or about and between October 2, 2019 and September 25, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully and feloniously attempted to influence Judge Keri Yoder, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, 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.

**A. Gunnison County:**

**COUNT FIVE**  
OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)

On or about and between October 9, 2019 and July 6, 2021, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Special Powers of Attorney Coupled with Interest filed against Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot on October 9, 2019; Quitclaim Deed filed on July 6, 2021 against Lori Talbot; and Final Arbitration Award filed on September 14, 2020 against Judge Keri Yoder, Lori Talbot, Judge Donald Corwin Jackson, and Judge Ashley Burgemeister; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Gunnison County Clerk and Recorder's Office or the Gunnison County Court Clerk's Office, with the knowledge or belief that the written instrument(s) would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument(s) contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT SIX**  
**CONSPIRACY TO COMMIT OFFERING A FALSE INSTRUMENT FOR  
RECORDING - FIRST DEGREE**  
**C.R.S. §§ 18-5-114(1), 18-2-201 (F6)**

On or about and between October 9, 2019 and July 6, 2021, in and triable in the State of Colorado, BRETT ANDREW NELSON, with the intent to promote or facilitate the commission of the crime of Offering a False Instrument for Recording, unlawfully and feloniously agreed with Victoria Clark, and persons or entities unknown to the Statewide Grand Jury and the prosecution, 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 18-5-114(1) and 18-2-201, C.R.S.

**COUNT SEVEN**  
**FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS**  
**C.R.S. § 18-5-102(1)(C) (F5)**

On or about and between October 9, 2019 and July 6, 2021, in and triable in the State of Colorado, BRETT ANDREW NELSON, with the intent to defraud Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, Lori Talbot, the Gunnison County Clerk & Recorder's Office, and the Gunnison County Court Clerk's Office, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Special Powers of Attorney Coupled with Interest filed against Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot on October 9, 2019; Quitclaim Deed filed on July 6, 2021 against Lori Talbot; and Final Arbitration Award filed on September 14, 2020 against Judge Keri Yoder, Lori Talbot, Judge Donald Corwin Jackson, and Judge Ashley Burgemeister; in violation of section 18-5-102(1)(c), C.R.S.

**B. Alamosa County:**

**COUNT EIGHT**

OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)

On or about October 2, 2019, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Durable Powers of Attorney Coupled with Interest filed against Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot on October 2, 2019; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Alamosa County Clerk and Recorder's Office, with the knowledge or belief that the written instrument(s) would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument(s) contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT NINE**

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS  
C.R.S. § 18-5-102(1)(C) (F5)

On or about October 2, 2019, in and triable in the State of Colorado, BRETT ANDREW NELSON, with the intent to defraud Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, Lori Talbot, and the Alamosa County Clerk & Recorder's Office, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Durable Powers of Attorney Coupled with Interest filed against Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, and Lori Talbot on October 2, 2019; in violation of section 18-5-102(1)(c), C.R.S.

**C. Montrose and San Miguel Counties:**

**COUNT TEN**

**OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)**

On or about and between January 3, 2020 and September 25, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Final Arbitration Award filed against Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot on January 3, 2020 in Montrose County; and Final Arbitration Award filed against Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot on September 25, 2020 in San Miguel County; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Montrose County Clerk and Recorder's Office and the San Miguel County Clerk's Office, with the knowledge or belief that the written instrument(s) would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument(s) contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT ELEVEN**

**FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS  
C.R.S. § 18-5-102(1)(C) (F5)**

On or about and between January 3, 2020 and September 25, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON, with the intent to defraud Judge Keri Yoder, Judge Donald Corwin Jackson, Judge Ashley Burgemeister, Lori Talbot, the Montrose County Clerk & Recorder's Office, and the San Miguel County Clerk's Office, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Final Arbitration Award filed against Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot on January 3, 2020 in Montrose County; and Final Arbitration Award filed against Judge Keri Yoder, Judge Ashley Burgemeister, Judge Donald Corwin Jackson, and Lori Talbot on September 25, 2020 in San Miguel County; in violation of section 18-5-102(1)(c), C.R.S.

Facts that support the offenses set forth in Counts One through Eleven above include, but are not limited to, the following:

15. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts One through Eleven by this reference.

i. Judge Keri Yoder:

16. In 2017, Judge Keri Yoder (“YODER”) became the presiding judge over the child custody case where NELSON was the Respondent, Gunnison County District Court Case No. 2015DR30.

17. YODER reported that, during the course of the domestic case, NELSON began filing voluminous pleadings, using language consistent with the sovereign citizen movement in his pleadings, and making threatening statements to YODER in the documents he filed. YODER reported that NELSON did not recognize the authority of the court in 2015DR30 and failed to follow court orders. For example, during a hearing on 2015DR30, Nelson showed up and tried to call “his own court into session.”

18. The record reveals that on October 2, 2019, NELSON filed a fraudulent document titled “Durable Power of Attorney Coupled with Interests,” purportedly on YODER’s behalf, with the Alamosa County Clerk and Recorder’s Office. The document alleged that YODER had conferred upon NELSON the authority to act on behalf of and as an agent for YODER and the 7<sup>th</sup> Judicial District of Colorado. NELSON signed the document, allegedly on behalf of YODER as principal, using his own name.

19. The record further reveals that on October 9, 2019, NELSON caused to be filed a fraudulent document titled “Special Power of Attorney Coupled with Interest,” purportedly on YODER’s behalf, with the Gunnison County Clerk and Recorder’s Office. The document alleged that YODER had conferred upon NELSON and the “House of Nelson” the authority to act on behalf of and as an agent for YODER and the 7<sup>th</sup> Judicial District of Colorado. NELSON signed the document, allegedly on behalf of YODER as principal, using his own name.

20. YODER confirmed that she did not sign any documents granting NELSON power of attorney, authorize the filing of these documents, or make NELSON her power of attorney in any manner.

21. The record shows that on October 16, 2019, NELSON filed a document titled “Order Vacating Void Orders and Dismissing 15DR30” with the Gunnison County Combined Courts, Court Clerk’s Office. This order ostensibly dismissed 15DR30, nullified all previous orders, voided all judgments, and demanded return of NELSON’s minor child. The pleading stated that failure to return the child to NELSON would result in the Petitioner of 15DR30, the child’s mother, being charged with “criminal kidnapping.” NELSON signed the order on behalf of YODER, citing the Special Power of Attorney document as his authority to do so.

22. In response to this fictitious Order, YODER issued a legitimate and proper order in case 2015DR30 on October 17, 2019. The legitimate Order stated that NELSON had no jurisdiction to dismiss the case, which remained open and scheduled for an upcoming hearing on November 1, 2019.

23. The record further reveals that on October 29, 2019, Nelson filed a document titled “Notice of Liability Regarding Trespass: Notice of Lien” in 15DR30, which stated that if YODER didn’t award him custody of his child and two hundred two thousand dollars (\$202,000.00), he was going to file a lien against her personal property. The document identified personal real estate owned by YODER and her husband. NELSON also listed a property near New York City that was owned by her friend.

24. YODER reported she felt NELSON filed the Notice of Liability in order to try to influence her decisions as the judge presiding over 2015DR30, by attempting to threaten her with action if she didn’t do what he wanted in the case and at the upcoming hearing.

25. YODER became concerned for her safety and the safety of her family as a result of NELSON’s conduct. Judicial security began assigning deputies to be present in the courtroom during YODER’s cases with NELSON. Deputies were on heightened alert when NELSON appeared for court.

26. After NELSON attempted to contact YODER and spoke with her husband at her home phone number in order to demand payment of an arbitration award that he said YODER owed him, YODER became concerned for her children and asked the sheriff’s department to drive by her house several times a day. YODER and her husband began taking turns staying at home because of NELSON. She purchased a security system for her home.

27. YODER was also concerned about her economic security as a result of NELSON's conduct. On September 18, 2020, NELSON sent YODER an email saying he intended to collect on the judgment debt. On September 19, 2020, NELSON sent a further demand for payment.

28. The Statewide Grand Jury Investigation revealed and the record shows receipts reflecting that the Special Powers of Attorney Coupled with Interest filed on October 9, 2019 against BURGEMEISTER, YODER, JACKSON, and TALBOT were filed by NELSON's girlfriend, Victoria Clark, on NELSON's behalf. Ms. Clark paid for the filings using NELSON's email address and mailing address.

ii. Judge Ashley Burgemeister:

29. Judge Ashley Burgemeister ("BURGEMEISTER") is a County Court Judge in the 7<sup>th</sup> Judicial District.

30. BURGEMEISTER presided over multiple criminal cases wherein NELSON was named as a defendant. The cases included 2017M167 in Gunnison County, a dog bite case wherein Gregory Haase was the victim, as well as misdemeanor traffic cases.

31. BURGEMEISTER reported that during the cases she presided over, NELSON used sovereign-like tactics to create delays.

32. The record reveals that on October 2, 2019, NELSON filed a fictitious "Durable Power of Attorney Couple with Interests" purportedly on BURGEMEISTER's behalf, and had it recorded with the Alamosa County Clerk and Recorder. In this document, NELSON named BURGEMEISTER as the principle, holding himself out to be BURGEMEISTER, and naming himself as her power of attorney. He signed the signature block for the principle with his own name.

33. The record also reveals that on October 9, 2019, NELSON filed a fictitious document against BURGEMEISTER titled "Special Power of Attorney Coupled with Interest" with the Gunnison County Clerk and Recorder. In it, NELSON again named BURGEMEISTER as the principle, holding himself out to be BURGEMEISTER, and naming himself as her power of attorney. He signed the signature block for the principle with his own name.

34. On September 17, 2020, NELSON published a Notice of Lien and Intent to Levy in the Gunnison Country Times newspaper in Gunnison, Colorado. The publication announced his intent to levy “all goods and chattels, lands, tenements, and real estate” of BURGEMEISTER. It stated that failure to cure the alleged judgment debt within fourteen (14) days constituted a forfeiture of assets.

35. BURGEMEISTER reported that she did not sign any documents granting NELSON power of attorney, authorize the filing of these documents, or make NELSON her power of attorney in any manner.

36. BURGEMEISTER contacted the Gunnison County Clerk and Recorder’s Office but was told there was no way to prevent NELSON from filing a spurious lien against her personal property, which caused BURGEMEISTER to fear NELSON would create personal financial difficulties for BURGEMEISTER and her family.

iii. Judge Donald Corwin Jackson:

37. JACKSON is a District Court Judge in the 7<sup>th</sup> Judicial District. JACKSON presided over approximately ten criminal cases wherein NELSON was a defendant.

38. JACKSON issued orders prohibiting NELSON from filing erroneous pleadings in the criminal cases. JACKSON also issued judgments against Nelson that were associated with sanctions. JACKSON had issued parenting time orders in NELSON’S domestic relations case, 15DR30, after Judge Yoder recused herself from the case. JACKSON also presided over NELSON’s criminal theft case involving victims Rodney Morrill, Nancy Church, and Kathy Norgard.

39. JACKSON characterized the overall theme of pleadings filed by NELSON in his criminal cases as asking JACKSON why he had the right to rule or make decisions over NELSON’s cases. NELSON claimed that JACKSON did not have jurisdiction and, therefore, could not issue orders affecting him. JACKSON reported that he believed NELSON filed pleadings in the cases in order to create delay and to be “antagonistic.”

40. The record reveals that NELSON filed a fraudulent “Durable Power of Attorney Coupled with Interests” in Alamosa County on October 2, 2019, which purported to confer upon NELSON the authority to act on behalf of JACKSON



and the 7<sup>th</sup> Judicial District of Colorado. NELSON signed the document as principle, allegedly on JACKSON's behalf, using his own name.

41. The record further reflects that NELSON also filed a fraudulent "Special Power of Attorney Coupled with Interest" in Gunnison County on October 9, 2019, which purported to confer upon NELSON and the "House of Nelson" the authority to act on behalf of JACKSON and the 7<sup>th</sup> Judicial District of Colorado. NELSON signed the document as principle, allegedly on JACKSON's behalf, using his own name.

42. JACKSON confirmed he did not authorize or sign either of these documents, nor did he confer any power of attorney upon NELSON to act on his behalf.

43. JACKSON reported that he felt NELSON was trying to influence his rulings in cases involving NELSON by filing the Powers of Attorneys.

44. The investigation reveals and the record reflects that on September 15, 2020, NELSON published a Notice of Lien and Intent to Levy against JACKSON's "goods and chattels, lands, tenements, and real estate" in the Montrose Daily Press. NELSON stated that failure to cure the judgment debt within fourteen (14) days would constitute forfeiture of assets. A copy of the Notice of Lien was located within NELSON's residence during an execution of a search warrant on September 25, 2020.

iv. Lori Talbot:

45. Lori Talbot ("TALBOT") is an attorney in Gunnison County. TALBOT represented the mother of NELSON's child in a domestic relations case in Gunnison County, Case No. 2015DR30.

46. TALBOT reported that in October 2019, NELSON mailed TALBOT a documented titled, "Notice of Liability Regarding Trespass: Notice of Lien Notice of Seizure." This document purported that because TALBOT violated NELSON's "estate," she owed him damages. NELSON listed TALBOT's home as a means of payment for the damages.

47. The record reveals that NELSON filed a fraudulent "Durable Power of Attorney Coupled with Interests" for TALBOT with the Alamosa County Clerk and Recorder on October 2, 2019. NELSON also filed a fraudulent "Special Power

of Attorney Coupled with Interest” for TALBOT on October 9, 2019 with the Gunnison County Clerk and Recorder. NELSON signed both documents as principle, purportedly on behalf of TALBOT, using his own name.

48. TALBOT reported that she did not sign any documents granting NELSON power of attorney, authorize the filing of these documents, or make NELSON her power of attorney in any manner.

49. TALBOT reported that in September 2020, NELSON called TALBOT and left her a voicemail demanding payment for the fictitious arbitration award. As a result, TALBOT became fearful of retaliation by NELSON and installed security cameras at her home.

50. The record reveals that on September 17, 2020, NELSON published a Notice of Lien and Intent to Levy in the Gunnison Country Times newspaper in Gunnison, Colorado. The publication announced his intent to levy “all goods and chattels, lands, tenements, and real estate” of TALBOT. It stated that failure to cure the alleged judgment debt within fourteen (14) days constituted a forfeiture of assets.

51. The record further reflects that NELSON filed a fraudulent Quitclaim Deed against TALBOT’s property in Gunnison County on July 6, 2021, purportedly saying that TALBOT was giving all ownership rights of her personal real estate to NELSON. TALBOT confirmed that she did not authorize any such transfer of rights.

52. TALBOT reported that she was very alarmed and concerned about the Notice of Lien and Quitclaim Deed, which caused her to worry about not only financial harm but also damage to her professional reputation as a small business owner in Gunnison County. TALBOT reported she felt NELSON was attempting to influence her decisions as opposing counsel in his ongoing domestic relations case.

## **II. JUDGE DANIEL WALZL**

### **COUNT TWELVE** **CRIMINAL EXTORTION** **C.R.S. § 18-3-207(1)(a),(b)(1) (F4)**

On or about and between May 3, 2019 and May 27, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with the intent to induce Judge Daniel Walzl against his will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Judge Daniel Walzl, 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 THIRTEEN**  
CONSPIRACY TO COMMIT CRIMINAL EXTORTION  
C.R.S. §§ 18-3-207(1)(a),(b)(1); 18-2-101 (F5)

On or about and between May 3, 2019 and May 27, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with Victoria Clark, and persons or entities unknown to the Statewide Grand Jury and the prosecution, that one or more of them would engage in conduct that constituted that crime or an attempt to commit that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-3-2017 and 18-2-101, C.R.S.

**COUNT FOURTEEN**  
RETALIATION AGAINST A JUDGE  
C.R.S. § 18-8-615 (F4)

On or about and between May 3, 2019 and May 27, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and knowingly, as retaliation or retribution against Judge Daniel Walzl, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting, made a credible threat or committed an act of harm or injury upon a person or property against or upon Judge Daniel Walzl, the judge; in violation of section 18-8-615, C.R.S.

**COUNT FIFTEEN**  
ATTEMPT TO INFLUENCE A PUBLIC SERVANT  
C.R.S. § 18-8-306 (F4)

On or about and between May 3, 2019 and May 27, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully and feloniously

attempted to influence Judge Daniel Walzl, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, 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 SIXTEEN**  
STALKING – THREAT – COMMUNICATE  
C.R.S. § 18-3-602(1)(b) (F5)

On or about and between May 3, 2019 and September 25, 2020, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and knowingly, directly or indirectly through another person, made a credible threat to Judge Daniel Walzl and, in connection with the threat, repeatedly made any form of communication with the victim; in violation of section 18-3-602(1)(b), C.R.S.

**A. Saguache County and Alamosa County:**

**COUNT SEVENTEEN**  
OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)

On or about and between October 2, 2019 and October 9, 2019, in and triable in the State of Colorado, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Durable Power of Attorney Coupled with Interest filed against Judge Daniel Walzl on October 2, 2019; and Special Power of Attorney Coupled with Interest filed against Judge Daniel Walzl on October 9, 2019; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Saguache County Clerk and Recorder's Office and the Alamosa County Clerk and Recorder's Office, with the knowledge or belief that the written instrument(s) would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument(s) contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT EIGHTEEN**  
FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS

C.R.S. § 18-5-102(1)(C) (F5)

On or about and between October 2, 2019 and October 9, 2019, in and triable in the State of Colorado, BRETT ANDREW NELSON, with the intent to defraud Judge Daniel Walzl, the Alamosa County Clerk & Recorder's Office, and the Saguache County Clerk & Recorder's Office, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Durable Power of Attorney Coupled with Interest filed against Judge Daniel Walzl on October 2, 2019; and Special Power of Attorney Coupled with Interest, filed against Judge Daniel Walzl on October 9, 2019; in violation of section 18-5-102(1)(c), C.R.S.

Facts that support the offenses set forth in Counts Twelve through Eighteen above include, but are not limited to, the following:

53. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Twelve through Eighteen by this reference.

54. Judge Daniel Walzl ("WALZL") is a County Court Judge in the 12th Judicial District.

55. WALZL presided over multiple criminal Alamosa County Court cases wherein NELSON was a named defendant. The cases include 17T775 and 17T729, two traffic cases in Alamosa County.

56. WALZL reported that, during the course of the criminal cases that he presided over, NELSON became "increasingly aggressive" and "concerning."

57. WALZL reported that NELSON's behavior during court was similar to that of "constitutionalists," or "sovereigns." He described that NELSON challenged the court's jurisdiction and authority.

58. The record reveals that on May 3, 2019, NELSON filed a Default Judgment against WALZL with the Alamosa County Clerk and Recorder's Office,

purporting that WALZL owed him four hundred and twenty-five thousand dollars (\$425,000.00).

59. The record further reveals that on October 2, 2019, NELSON filed a document titled “Durable Power of Attorney Coupled with Interests” with the Alamosa County Clerk and Recorder’s Office, purportedly on WALZL’s behalf. The document alleged that WALZL had conferred upon NELSON the authority to act on behalf of and as an agent for WALZL and the Alamosa County Court. NELSON signed the document as principle using his own name, purportedly on behalf of WALZL.

60. The record also shows that on October 9, 2019, NELSON filed a document titled “Special Power of Attorney Coupled with Interest” with the Saguache County Clerk’s Office, purportedly on WALZL’s behalf. The document alleged that WALZL had conferred upon NELSON and the “House of Nelson” the authority to act on behalf of and as an agent for WALZL and the Alamosa County Court. NELSON again signed the document on behalf of WALZL as principal, using his own name.

61. The Saguache County Clerk’s Office is located at 501 4th St. Saguache, (Saguache County), CO 81149.

62. WALZL confirmed that he did not sign any documents granting NELSON power of attorney, authorize the filing of these documents, or make NELSON his power of attorney in any manner.

63. WALZL reported that he believes NELSON filed these documents in an attempt to create a conflict that would cause WALZL to recuse himself from NELSON’S cases, thus causing delay.

64. WALZL reported that he was afraid for his safety and that of his family after an incident involving NELSON. A local attorney named Tammy Sullivan hired a process server, Kevin Squires, to serve NELSON in the domestic relations case out of Gunnison County. Mr. Squires reported to WALZL that, after NELSON was served, he became agitated and said he was going to “take Judge Walzl’s house.” Mr. Squires was so concerned about NELSON’s statements and demeanor regarding WALZL that he reported them to Ms. Sullivan, who reported the incident to WALZL. WALZL was concerned and contacted Judicial Security, who provided him a photograph of NELSON. WALZL showed the photograph to

his wife and children, specifically telling his family that if any of them saw NELSON, or if he came to their house, they should immediately call 911.

65. WALZL reported he became further concerned for the safety and security of himself and his family in October 2019 after he began receiving emails from NELSON at his personal email address. WALZL reported that the emails made him feel very uncomfortable. The emails included a Final Arbitration Award from Sitcomm, dated January 1, 2020, purportedly awarding NELSON \$6,898,000.00 against WALZL for alleged breach of contract. The emails also included a Demand to Cure Debt dated January 28, 2020, related to the Arbitration Award.

66. During an execution of a search warrant at NELSON's residence on September 25, 2020, it was discovered that NELSON had posted on his wall an Order denying a Petition in a civil case in Denver District Court that NELSON had filed against WALZL. The record reveals that NELSON had filed a Petition to Domesticate Foreign Judgment in Denver District Court in an attempt to collect against WALZL on the fraudulent Arbitration Award.

67. The Statewide Grand Jury investigation revealed and the record shows that between October 20, 2019 and May 27, 2020, NELSON sent multiple emails to WALZL at WALZL's personal email address, demanding payment of debts allegedly owed to NELSON.

68. On October 21, 2019, NELSON emailed WALZL a Motion to Vacate and Set Aside Order, in which he attempted to get an adverse order vacated in a civil case he filed against WALZL in Gunnison County. The Motion referred to the order as "gobbledegook" and accused the judge in that case of manipulating the law "to benefit his counterpart Walzl."

69. The record reveals that on January 28, 2020, NELSON emailed WALZL a "File on Demand and Notice" to be filed in cases 17T775 and 17T729. Attached was a document titled "Demand to Cure Debt: Notice of Liability" dated January 28, 2020. In it, NELSON stated that WALZL owes him \$6,989,000.00 related to a Final Arbitration Award from Sitcomm. NELSON states he was seeking sanctions and two times that alleged debt. The Final Arbitration Award was attached to the email. NELSON stated that if the debt isn't paid by February 11, 2020, he would begin the process of seizing WALZL's personal real estate and place the property on the market for short sale.

70. In emails to WALZL dated between May 26, 2020 and May 27, 2020, NELSON stated he is conferring regarding sanctions of two times the amount allegedly owed by WALZL. He attaches a Motion for Sanctions with the caption of “Superior Court of Record,” with NELSON and the House of Nelson as Plaintiff.

### **III. OTHER QUITCLAIM DEEDS AND DEFAULT JUDGMENTS**

#### **A. Gunnison County:**

#### **COUNT NINETEEN**

**OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)**

On or about and between August 23, 2019 and July 6, 2021, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Quitclaim Deed, Reception No. 677338, filed against Christopher Danos on July 6, 2021; Quitclaim Deed, Reception No. 676958, filed against Rodney Morrill on June 21, 2021; Quitclaim Deeds, Reception Nos. 676956 and 676957, filed against Sarah Katherine Rais (Hindes) on June 21, 2021; Quitclaim Deed, Reception No. 677340, filed against Wesley Hersberger on July 6, 2021; Default Judgment, Reception No. 661860, filed against Craig Isham, Holly King (Hedstrom), Sarah Katherine Rais (Hindes), and Wesley Hersberger on August 23, 2019; Default Judgment, Reception No. 661861, filed against Rosana Fonseca-Elias on August 23, 2019; Default Judgment, Reception No. 661862, filed against Gregory Haase on August 23, 2019; and Default Judgment, Reception No. 661863, filed against Christopher Danos, Kathy Norgard, Nancy Church, Rodney Morrill, and Will Shoemaker on August 23, 2019, relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Gunnison County Clerk and Recorder’s Office, with the knowledge or belief that the written instrument would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

#### **COUNT TWENTY**

**FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS  
C.R.S. § 18-5-102(1)(C) (F5)**



On or about and between August 23, 2019 and July 6, 2021, BRETT ANDREW NELSON, with the intent to defraud Rodney Morrill, Sarah Katherine Rais (Hindes), Christopher Danos, Wesley Hersberger; Craig Isham, Holly King (Hedstrom), Rosana Fonseca-Elias, Gregory Haase, Kathy Norgard, Nancy Church, Will Shoemaker, and the Gunnison County Clerk & Recorder's Office, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Quitclaim Deed, Reception No. 677338; Quitclaim Deed, Reception No. 676958; Quitclaim Deeds, Reception Nos. 676956 and 676957; Quitclaim Deed, Reception No. 677340; Default Judgment, Reception No. 661860; Default Judgment, Reception No. 661861; Default Judgment, Reception No. 661862; and Default Judgment, Reception No. 661863; in violation of section 18-5-102(1)(c), C.R.S.

**B. Alamosa County:**

**COUNT TWENTY-ONE**

OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5)

On or about May 3, 2019, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Default Judgment, Reception No. 373101, filed against Billy Salazar, James Chavez, Jason Chacon, Keith Stambaugh, Judge Daniel Walzl, and Kelsey Waldorf; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Alamosa County Clerk and Recorder's Office, with the knowledge or belief that the written instrument would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT TWENTY-TWO**

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS  
C.R.S. § 18-5-102(1)(C) (F5)

On or about May 3, 2019, BRETT ANDREW NELSON, with the intent to defraud Billy Salazar, James Chavez, Jason Chacon, Keith Stambaugh, Judge Daniel Walzl, and Kelsey Waldorf, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Default Judgment, Reception No. 373101; in violation of section 18-5-102(1)(c), C.R.S.

**C. Saguache County:**

**COUNT TWENTY-THREE**

OFFERING A FALSE INSTRUMENT FOR RECORDING - FIRST DEGREE  
C.R.S. § 18-5-114(1) (F5) 10121

On or about and between October 9, 2019 and October 18, 2019, BRETT ANDREW NELSON unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Special Powers of Attorney Coupled with Interest filed against Joshua Dougherty, Jessica Waggoner, and Jason Kelly on October 9, 2019; and Special Powers of Attorney Coupled with Interest filed against Sarah Katherine Rais (Hindes), Rodney Morrill, Christopher Danos, and Wesley Hersberger on October 18, 2019; relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Saguache County Clerk and Recorder's Office, with the knowledge or belief that the written instrument would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

**COUNT TWENTY-FOUR**

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS  
C.R.S. § 18-5-102(1)(C) (F5) 1001C

On or about and between October 9, 2019 and October 18, 2019, BRETT ANDREW NELSON, with the intent to defraud Joshua Dougherty, Jessica Waggoner, Jason Kelly, Sarah Katherine Rais (Hindes), Rodney Morrill, Christopher Danos, and Wesley Hersberger unlawfully, feloniously, and falsely

made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Special Powers of Attorney Coupled with Interest filed on October 9, 2019; and Special Powers of Attorney Coupled with Interest filed on October 18, 2019; in violation of section 18-5-102(1)(c), C.R.S.

Facts that support the offenses set forth in Counts Twenty through Twenty-Four above include, but are not limited to, the following:

71. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Twenty through Twenty-Four by this reference.

72. The Statewide Grand Jury investigation revealed and the record shows that NELSON filed fraudulent Quitclaim deeds on multiple residences in Gunnison County, Colorado, attempting to transfer ownership of the properties to himself. Investigation revealed that the owners of the properties include various individuals who had interactions with NELSON related to criminal and domestic relations cases wherein he was named as a defendant or respondent:

- a. On July 6, 2021, NELSON and the “House of Nelson” filed a Quitclaim Deed, Reception No. 677338, against personal real estate belonging to Christopher Danos (“DANOS”). DANOS interacted with NELSON in the course of his duties as a Detective with the City of Gunnison Police Department, in regard to theft case 2017CR63 in Gunnison County. This case also involved victims Rodney Morrill, Kathy Norgard, and Nancy Church, as well as prosecutor Jessica Waggoner. BURGEMEISTER and JACKSON presided over the case. NELSON signed the Quitclaim Deed in his name, purportedly “for” DANOS as “Attorney in Fact.” In it, he purports to assume DANOS’s property in satisfaction of a six hundred and thirty-five thousand dollars (\$635,000.00) judgment debt, plus sanctions and interest.
- b. On June 21, 2021, NELSON and the “House of Nelson” filed a Quitclaim Deed, Reception No. 676958, against personal real estate belonging to Rodney Morrill (“MORRILL”). MORRILL was an alleged victim and reporting party in Gunnison County Case No. 2017CR63,

in which NELSON was named as an alleged defendant. NELSON signed the Quitclaim Deed in his name, purportedly “for” MORRILL as “Attorney in Fact.” In it, he purports to assume MORRILL’s property in satisfaction of a five hundred and fifty thousand dollars (\$550,000.00) judgment debt, plus sanctions and interest.

- c. On June 21, 2021, NELSON and the “House of Nelson” filed a Quitclaim Deed, Reception No. 676956, against personal real estate belonging to Sarah Rais, who was previously named Sarah Hinds (hereafter, “RAIS”). However, NELSON made a mistake in the document, which listed TALBOT’s name under the line containing NELSON’s signature, as well as TALBOT’s real estate. NELSON subsequently filed a second Quitclaim Deed, Reception No. 676957, in Gunnison County that same day correcting those errors. RAIS is a nurse in Gunnison County and was an alleged victim in Case No. 2018M036 in Gunnison County, which involved charges against NELSON of alleged child abuse and reckless endangerment. This case also involved Wesley Hersberger, Craig Isham, Holly King (Hedstrom), Rosana Fonseca-Elias, and Joshua Dougherty, and was presided over by BURGEMEISTER. RAIS also testified against NELSON at a child custody hearing in 15DR30. NELSON signed the Quitclaim Deed in his name, purportedly “for” RAIS as “Attorney in Fact.” In the amended version of the document, NELSON purports to assume RAIS’s property in satisfaction of a one hundred and eighty-five thousand dollars (\$185,000.00) judgment debt, plus sanctions and interest.
- d. On July 6, 2021, NELSON and the “House of Nelson” filed a Quitclaim Deed, Reception No. 677340, against personal real estate belonging to Wesley Hersberger (“HERSBERGER”). HERSBERGER interacted with NELSON in the course of his duties as a Corporal with the Gunnison County Sheriff’s Office, in regard to Case No. 2018M036 in Gunnison County. NELSON signed the Quitclaim Deed in his name, purportedly “for” HERSBERGER as “Attorney in Fact.” In it, he purports to assume HERSBERGER’s property in satisfaction of a ninety-five thousand dollars (\$95,000.00) judgment debt, plus sanctions and interest.

73. The Statewide Grand Jury investigation revealed and the record shows that NELSON also filed fraudulent Default Judgments against multiple individuals in Gunnison and Alamosa Counties.

74. The record reveals that on May 3, 2019, NELSON filed a Default Judgment, Reception No. 373101, with the Alamosa County Clerk and Recorder's Office. The Default Judgment was filed against Billy Salazar, Judge Daniel Walzl, James Chavez, Jason Chacon, Keith Stambaugh, and Kelsey Waldorf. Investigation revealed that these individuals had interactions with NELSON in regard to criminal or domestic relations cases wherein NELSON was named as a defendant or respondent, as follows.

- a. Billy Salazar ("SALAZAR") is a Trooper who interacted with NELSON in the performance of his duties with the Colorado State Patrol. SALAZAR wrote NELSON a ticket related to a traffic case, Case No. 2017T775 in Alamosa County. NELSON alleged in the Default Judgment that SALAZAR owes him five thousand dollars (\$5,000.00) for unlawfully administering his estate and for humiliation and intimidation.
- b. James Chavez ("CHAVEZ") was a Deputy who interacted with NELSON in the performance of his duties with the Alamosa County Sheriff's Office. CHAVEZ wrote NELSON a ticket related to a traffic case, Case No. 2017T729 in Alamosa County. NELSON alleged in the Default Judgment that CHAVEZ owes him six hundred and fifty thousand dollars (\$650,000.00) for unlawfully administering his estate, illegal detainment, abuse of his position, acts of treason, humiliation and intimidation.
- c. WALZL presided over Case Nos. 2017T729 and 2017T775. In the Default Judgment, NELSON alleged that WALZL owes him four hundred and twenty-five thousand dollars (\$425,000.00) for unlawfully administering his estate, abuse and threats while impersonating a judge, abuse of his position, acts of treason, humiliation and intimidation.
- d. Kelsey Waldorf ("WALDORF") was a Deputy District Attorney in the 12<sup>th</sup> Judicial District who prosecuted Alamosa County Case Nos. 2017T729 and 2017T775. NELSON alleged in the Default Judgment that WALDORF owed him two hundred and seventy-five thousand

dollars (\$275,000.00) for unlawfully administering his estate, illegal detainment in a false court, abuse of her position, “attack of the rights of We The People,” acts of treason, humiliation and intimidation.

- e. Jason Chacon (“CHACON”) was a Deputy who interacted with NELSON during the performance of his duties with the Alamosa County Sheriff’s Office. CHACON was working Court Security at the Alamosa Courthouse and contacted NELSON regarding an arrest warrant. CHACON was given papers later regarding a lawsuit NELSON filed against him. NELSON alleged in the Default Judgment that CHACON owed him thirty-six thousand dollars (\$36,000.00) for unlawfully administering his estate, wrongful detainment, kidnapping and false imprisonment, humiliation and intimidation.
- f. Keith Stambaugh is a Deputy with the Alamosa County Sheriff’s Office. Stambaugh was an intake deputy who interacted with NELSON after his CHACON contacted NELSON regarding the warrant. NELSON alleged in the Default Judgment that “Keith Stambrough” (hereafter using his correct name, “STAMBAUGH”) owed him thirty-six thousand dollars (\$36,000.00) for unlawfully administering his estate, wrongful detainment, kidnapping and false imprisonment, humiliation and intimidation.

75. The record also reveals that NELSON filed a fraudulent Default Judgment, Reception No. 661860, with the Gunnison County Clerk and Recorder’s Office on August 23, 2019 against Craig Isham, Holly Hedstrom, “Sarah Hindes,” and Wesley Hersberger. NELSON again demands monetary damages for alleged breach of contract and failure to administer his estate from each respondent.

76. The facts set forth in Paragraph 72, above, related to RAIS and HERSBERGER, are incorporated by reference herein below. NELSON made the following allegations against RAIS and HERSBERGER in the Default Judgment:

- a. NELSON alleged that RAIS owed him damages in the amount of one hundred and eight-five thousand dollars (\$185,000.00) for exceeding her jurisdiction, lack of knowledge of the law, intrusion into the lives of NELSON and his son, damage to a private conveyance vehicle, and for “blatant disregard for the rights of one of the people in a common law jurisdiction.”

- b. NELSON alleged that HERSBERGER owed him damages in the amount of ninety-five thousand dollars (\$95,000.00) for exceeding his jurisdiction, lack of knowledge of the law, illegal detention, and for “blatant disregard for the rights of one of the people in a common law jurisdiction.”

77. In addition, investigation revealed that the other respondents named in the Default Judgment also had interactions with NELSON related to his criminal or domestic relations cases:

- a. Craig Isham (“ISHAM”) is a Gunnison County Sheriff’s Deputy who arrested NELSON with regard to the allegations of child abuse and reckless endangerment in Case No. 2018M036 in Gunnison County. This case also involved HERSBERGER, HEDSTROM, FONSECA-ELIAS, and RAIS, and was presided over by BURGEMEISTER. NELSON alleged in the Default Judgment that ISHAM owes him seventy-five thousand dollars (\$75,000.00) for exceeding his jurisdiction as a sheriff’s deputy, alleged harassment and intimidation, alleged lack of knowledge of the law, and for his “erroneous investigation and for his blatant disregard for the rights of one of the people in a common law jurisdiction.”
- b. Holly King (Hedstrom) (“HEDSTROM”) was a social worker with the Department of Health and Human Services in Gunnison County, who was involved in an investigation of child abuse and neglect related to custody of NELSON’s child. The investigation arose out of Gunnison County Case No. 2018M036, which also involved HERSBERGER, ISHAM, RAIS, and Rosana Fonseca-Elias, and which was presided over by BURGEMEISTER. NELSON alleged in the Default Judgment that HEDSTROM owes him forty-five thousand dollars (\$45,000.00) for exceeding her jurisdiction, alleged lack of knowledge of the law, erroneous investigation, and for “blatant disregard for the rights of one of the people in a common law jurisdiction.”

78. The Statewide Grand Jury Investigation revealed and the record shows that NELSON also filed multiple other fraudulent Default Judgments on August 23, 2019 against individuals who came into contact with NELSON through his criminal and domestic relations cases.

79. The record reveals that on August 23, 2019, NELSON filed a Default Judgment, Reception No. 661861, with the Gunnison County Clerk and Recorder's Office. The Default Judgment was filed against Rosana Fonseca-Elias ("FONSECA-ELIAS"), the mother of NELSON's child and the Petitioner in Gunnison County child custody case 2015DR30. In the Default Judgment, NELSON accused FONSECA-ELIAS of "an act of treason," alleged that she had no legal claim to their child, and stated that she owed him two hundred and two thousand dollars (\$202,000.00). NELSON demanded that FONSECA-ELIAS deliver their child to him upon penalty of arrest.

80. The record further reveals on August 23, 2019, NELSON filed a Default Judgment, Reception No. 661862, with the Gunnison County Clerk and Recorder's Office. The Default Judgment was filed against Gregory Haase, who is the victim in a dog bite case, 2017M167 in Gunnison County. Joshua Dougherty was the prosecutor with the 12<sup>th</sup> Judicial District Attorney's Office assigned to the case, which was presided over by BURGEMEISTER. In the Default Judgment, NELSON alleged that HAASE owes him fifteen thousand dollars (\$15,000.00) "for creation of a false claim..."

81. The record further shows that on August 23, 2019, NELSON filed a Default Judgment, Reception No. 661863, with the Gunnison County Clerk and Recorder's Office. The Default Judgment was filed against DANOS, Kathy Norgard, Nancy Church, Rodney Morrill, and Will Shoemaker. The facts pertaining to DANOS, which are set forth above, are incorporated by reference herein below. NELSON alleged in the Default Judgment that DANOS owed him damages of six hundred and thirty-five thousand dollars (\$635,000.00) for unlawfully administering his estate, willful negligence, defamation of character, and for humiliation and intimidation. In addition, investigation revealed that the other respondents named in the Default Judgment also had interactions with NELSON related to his criminal or domestic relations cases:

- a. Kathy Norgard ("NORGARD") is an alleged victim in theft case 2017CR63 in Gunnison County, which was investigated by DANOS and presided over by BURGEMEISTER and JACKSON. This case also included MORRILL as an alleged victim. In the Default Judgment, NELSON alleged NORGARD owes him three hundred and twenty-five thousand dollars (\$325,000.00) for unlawfully administering his estate and for loss related to his business, and accuses her of extortion, fraud, defamation of character, humiliation, and intimidation.



- b. Nancy Church (“CHURCH”) is also an alleged victim in theft case 2017CR63 in Gunnison County. In the Default Judgment, NELSON alleged CHURCH owes him three hundred and twenty-five thousand dollars (\$325,000.00) for unlawfully administering his estate and for loss related to his business, and also accuses her of extortion, fraud, defamation of character, humiliation, and intimidation.
- c. William Shoemaker (“SHOEMAKER”) was the editor of the Gunnison Country Times from 2011-2020. NELSON had worked at the newspaper as a sales representative for several years. SHOEMAKER reported on the criminal theft charges against NELSON related to Gunnison County Case No. 2017CR63. SHOEMAKER reported he believed NELSON was trying to get back at him for reporting on the case. In the Default Judgment, NELSON alleged SHOEMAKER owes him one hundred and thirty-five thousand dollars (\$135,000.00) for unlawfully administering his estate, defamation, irresponsible reporting, humiliation, and intimidation.

82. The record reveals that on October 9, 2019, NELSON also filed fraudulent power of attorney documents with the Saguache County Clerk & Recorder’s Office against two criminal prosecutors and a county attorney:

- a. NELSON and the “House of Nelson” filed a Special Power of Attorney Coupled with Interest against Jessica Waggoner (“WAGGONER”). The document claims to give NELSON authority to act on behalf of WAGGONER and is signed by NELSON as WAGGONER’s alleged agent. WAGGONER is a Deputy District Attorney in the 7<sup>th</sup> Judicial District who prosecuted Gunnison County Case No. 2017CR63. WAGGONER confirmed that she never authorized NELSON to act as her power of attorney or agent at any time.
- b. NELSON and the “House of Nelson” filed a Special Power of Attorney Coupled with Interest against Joshua Dougherty (“DOUGHERTY”). The document claims to give NELSON authority to act on behalf of DOUGHERTY and is signed by NELSON as DOUGHERTY’s alleged agent. DOUGHERTY is a Deputy District Attorney in the 7<sup>th</sup> Judicial District who prosecuted Case Nos. 2018M036 and 2017M167.

DOUGHERTY confirmed he never authorized NELSON to act as his power of attorney or agent at any time.

- c. NELSON and the “House of Nelson” filed a Special Power of Attorney Coupled with Interest against Jason Kelly (“KELLY”). The document purports to give NELSON authority to act on behalf of KELLY and is signed by NELSON as KELLY’S alleged agent. KELLY is a County Attorney for Alamosa County. KELLY became aware of and concerned about documents being filed by NELSON, which included potential liens against elected and judicial officials. Accordingly, KELLY asked the Alamosa Clerk not to record any documents presented by NELSON until KELLY reviewed them. During at least one interaction with NELSON, KELLY informed NELSON that his documents were spurious and would not be filed in Alamosa County. Subsequently, NELSON showed up in Alamosa County with more documents and KELLY informed him that they would not be filed. NELSON subsequently filed the power of attorney document, which KELLY believes was retaliatory. KELLY confirmed he never authorized NELSON to act as his power of attorney or agent.

83. The record also reflects that on October 18, 2019, NELSON filed fraudulent powers of attorney in Saguache County against RAIS, HERSBERGER, MORRILL, and DANOS:

- a. NELSON and the House of Nelson filed a Special Power of Attorney Coupled with Interest against RAIS. In it, NELSON purports to have authority to act on behalf of and as an agent for RAIS. NELSON signed his own name on the document as both agent and principle, “for” RAIS. RAIS confirmed she did not authorize this document or ever grant NELSON power of attorney over her.
- b. NELSON and the House of Nelson filed a Special Power of Attorney Coupled with Interest against MORRILL. In it, NELSON purports to have authority to act on behalf of and as an agent for MORRILL. NELSON signed his own name on the document as both agent and principle, “for” MORRILL. MORRILL confirmed he did not authorize this document or ever grant NELSON power of attorney over him.
- c. NELSON and the House of Nelson filed a Special Power of Attorney Coupled with Interest against DANOS. In it, NELSON purports to

have authority to act on behalf of and as an agent for DANOS. NELSON signed his own name on the document as both agent and principle, “for” DANOS. DANOS confirmed he did not authorize this document or ever grant NELSON power of attorney over him.

- d. NELSON and the House of Nelson filed a Special Power of Attorney Coupled with Interest against HERSBERGER. In it, NELSON purports to have authority to act on behalf of and as an agent for HERSBERGER. NELSON signed his own name on the document as both agent and principle, “for” HERSBERGER. HERSBERGER confirmed he did not authorize this document or ever grant NELSON power of attorney over him.

I, [REDACTED], the Foreperson of the 2021 - 2022 State  
(PRINT)

Grand Jury, do hereby swear or affirm that each and every True Bill returned in the Indictment by the 2021 - 2022 State Grand Jury was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the 2021 - 2022 State Grand Jury. The State Grand Jury further authorizes and instructs the Colorado Attorney General to return this Indictment to open court with or without the presence of the foreperson.

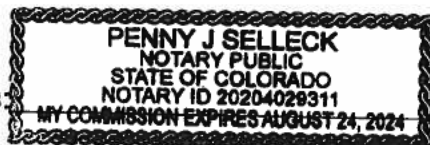
[REDACTED SIGNATURE]  
FOREPERSON'S SIGNATURE

Subscribed and sworn to before me in the City and County of Denver, State of Colorado, this 21<sup>st</sup> day of April, 2022.

[Signature]  
NOTARY PUBLIC

S E A L

My commission expires:



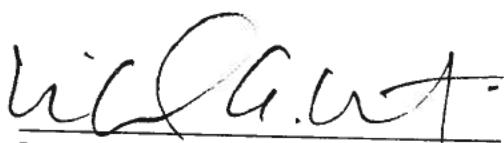
PHILIP J. WEISER,  
ATTORNEY GENERAL

[Signature]  
CRYSTAL LITTRELL, Reg. No. 36814  
Senior Assistant Attorney General  
Criminal Justice Section

The 2021 - 2022 State Grand Jury presents the within Indictment, and the same is hereby

Ordered filed this 4<sup>th</sup> day of April, 2022.

Pursuant to C.R.S. 13-73-107, the Court hereby designates the County of Gunnison (7<sup>th</sup> JD) Colorado, as the county of venue for the purposes of trial.



MICHAEL A. MARTINEZ  
Chief Judge, Second Judicial District