

DISTRICT COURT, CITY AND COUNTY OF DENVER STATE OF COLORADO 1437 Bannock Street Denver, CO 80202 <hr/> THE PEOPLE OF THE STATE OF COLORADO, v. <b>SHANNON MCSHANE, DOB 06/17/1967</b> Defendant.	<b>▲ COURT USE ONLY ▲</b>
PHILIP J. WEISER, Attorney General GWENN SANDROCK* Senior Assistant Attorney General 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO 80203 720-508-6000 Reg. No. 43283 * Counsel of Record	Case No.: 23CR001  Ctrm.: 259
<b>COLORADO STATE GRAND JURY INDICTMENT</b>	

**CHARGES**

- COUNT ONE:**                    **ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to the COLORADO DEPARTMENT OF REGULATORY AGENCIES)**
- COUNT TWO:**                    **FORGERY; C.R.S. § 18-5-102(1)(d) (F5) {1001D} (As to the COLORADO DEPARTMENT OF REGULATORY AGENCIES)**
- COUNT THREE:**                    **ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to the COLORADO DEPARTMENT OF CORRECTIONS)**
- COUNT FOUR:**                    **FORGERY; C.R.S. § 18-5-102(1)(d) (F5) {1001D} (As to the COLORADO DEPARTMENT OF CORRECTIONS)**
- COUNT FIVE:**                    **ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to the COLORADO DEPARTMENT OF HUMAN SERVICES/COLORADO MENTAL HEALTH INSTITUTE IN PUEBLO)**

- COUNT SIX:** FORGERY; C.R.S. § 18-5-102(1)(d) (F5) {1001D} (As to the COLORADO DEPARTMENT OF HUMAN SERVICES/COLORADO MENTAL HEALTH INSTITUTE IN PUEBLO)
- COUNT SEVEN:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to the OFFICE OF THE STATE COURT ADMINISTRATOR)
- COUNT EIGHT:** FORGERY; C.R.S. § 18-5-102(1)(d) (F5) {1001D} (As to the OFFICE OF THE STATE COURT ADMINISTRATOR)
- COUNT NINE:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to MAGISTRATE MATTHEW W. E. BRADLEY)
- COUNT TEN:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to JUDGE STEPHANIE M. G. GAGLIANO)
- COUNT ELEVEN:** FORGERY; C.R.S. § 18-5-102(1)(d) (F5) {1001D} (As to LOGAN COUNTY CLERK OF THE COURT, 13TH JUDICIAL (LOGAN COUNTY) MAGISTRATE MATTHEW W. E. BRADLEY, AND/OR A 13TH JUDICIAL (LOGAN COUNTY) DISTRICT COURT JUDGE STEPHANIE M.G. GAGLIANO)
- COUNT TWELVE:** PERJURY; C.R.S. § 18-8-502 {25011}
- COUNT THIRTEEN:** RETALIATION AGAINST A VICTIM OR WITNESS; C.R.S. § 18-8-706 {26112}
- COUNT FOURTEEN:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to JUDGE CAJARDO R. LINDSEY)
- COUNT FIFTEEN:** ATTEMPT TO INFLUENCE A PUBLIC SERVANT; C.R.S. § 18-8-306 (F4) {24051} (As to KIMBERLY BAIRD SCHUTT, KEVIN RICHARD KENNEDY, KANDACE BRADNER MAJOROS, LAUREN CAROL BYNUM, DEA M. LINDSEY, ASHLEY RATLIFF, ANITA MARIE SCHUTTE, AMANDA J. PHILIPPS, KELLIE L. STARRITT, DIANA K. MAY, TARRYN L. JOHNSON, AND/OR CHAD CLAYTON MILLER)

DISTRICT COURT, CITY AND COUNTY OF DENVER STATE OF COLORADO 1437 Bannock Street Denver, CO 80202 <hr/> THE PEOPLE OF THE STATE OF COLORADO, v. <b>SHANNON MCSHANE, DOB 06/17/1967</b> Defendant.	<b>▲ COURT USE ONLY ▲</b>
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Of the 2023-2024 term of the Denver District Court in the year 2024; the 2023-2024 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**

**The following serves as a representative summary of the non-exclusive essential facts:**

1. Shannon McShane (“MCSHANE”), DOB 06/17/1967, was a Colorado resident at all pertinent times in this case and resided in Monument, El Paso County, Colorado.
2. The Statewide Grand Jury obtained evidence and the record supports that over the course of approximately six years, MCSHANE represented herself to multiple Colorado state governmental agencies and judicial officers as holding a Doctor of Philosophy, or PhD, from the University of Hertfordshire in the United Kingdom. This representation allowed MCSHANE to obtain licensure with the Department of Regulatory Agencies (“DORA”) as a Certified Addiction Counselor, Licensed Addiction Counselor, a Psychologist

Candidate, and a Licensed Psychologist. DORA is located at 1560 Broadway, Denver, Colorado.

3. In July 2023 the Office of the Attorney General received two referrals regarding MCSHANE. One referral was from Inv. James Cannon in the 21st Judicial District in Mesa County, Colorado, and the other was from Magistrate Matthew W. E. Bradley in the 13th Judicial District in Northeast Colorado. Both professionals expressed concerns about MCSHANE's credentials and the use of those credentials to work as a Child and Family Investigator, or CFI. Magistrate Bradley's complaint was initially sent to the Office of the District Attorney for the 13th Judicial District, then forwarded to the Office of the Attorney General. Magistrate Bradley's complaint, in part, outlined several violations of the Colorado Revised Statutes he believed MCSHANE committed.
4. After receiving DORA licensure, MCSHANE applied to work at two state agencies and represented on her employment applications that she had earned a PhD. MCSHANE also sought and obtained employment with the Colorado Department of Corrections ("CDOC") and the Colorado Department of Human Services ("CDHS"), specifically to work at the Colorado Mental Health Institute in Pueblo ("CMHIP").
5. The licenses MCSHANE obtained through DORA also allowed her to serve as a Child and Family Investigator ("CFI") and Parental Responsibilities Evaluator ("PRE") in Domestic Relations cases throughout Colorado. MCSHANE also completed affidavits regarding her qualifications that she then submitted to the Office of the State Court Administrator ("SCAO"). SCAO is located at 1300 Broadway, Denver, Colorado.
6. SCAO reviewed and relied on MCSHANE's affidavits and other documentation and determined that MCSHANE was qualified to be on the statewide rosters for CFIs and PREs. MCSHANE stated on the CFI affidavit that she held a PhD from the University of Hertfordshire in the United Kingdom.
7. CFIs and PREs conduct investigations and provide judges and magistrates with reports of findings and recommendations as to issues such as parenting time and decision-making for children. As a CFI and PRE, MCSHANE filed documents such as mandatory disclosures and status reports with Courts throughout the state of Colorado. On each of those documents MCSHANE signed her name, followed by several acronyms such as "PhD." MCSHANE also testified under oath that she held a PhD.

8. MCSHANE was named in several complaints to DORA from parents in Colorado domestic relations cases. One such parent and a party in an Arapahoe County, Colorado, domestic relations (22DR30627) case was Chad Kullhem (“KULLHEM”). KULLHEM was a respondent in the domestic relations case in which MCSHANE was appointed as a CFI. KULLHEM became concerned about MCSHANE after his first interview with her and subsequently started to investigate her background. As a result of his investigation, he filed a complaint with DORA on February 15, 2023. Therein, KULLHEM stated that “Ms. MCSHANE’s PhD is not verifiable” and explained that “[s]he says she got her PhD in Psychology in 2017, however this not possible as she was also in Texas during this time. She studied for her master’s after 2017 at Texas State University.”
9. Due to his fears of retaliation, KULLHEM filed the DORA complaint anonymously. MCSHANE nonetheless contacted KULLHEM’S employer on February 28, 2023 and accused him of “cyber-stalking [her] because [she] did not rule for him 100% in a custody evaluation.” MCSHANE also informed KULLHEM’S employer that she was “about to contact the judge in his divorce case to let him about his behavior...” but first wanted to talk to his employer “to determine if his actions on company time constitute a violation.” In a later interview, KULLHEM expressed fear that he could still lose his job because of this situation, and he did not necessarily want his employer to know about his domestic relations case.
10. KULLHEM also provided DORA with emails between him and Roxanne Garara (“GARARA”), Associate Director of Academic Services at the University of Hertfordshire. On March 7, 2023, GARARA sent KULLHEM an email that stated in part, “I can confirm that the University has no record of any student with the name Shannon MCSHANE.”
11. GARARA communicated with investigators in this case on several occasions via email and in a video meeting. GARARA has maintained that MCSHANE has never been a student at University of Hertfordshire, and that she has searched variations of the names MCSHANE used at different times in her life as well as her date of birth. GARARA was unable to find records showing MCSHANE was a student at or earned a degree from the University of Hertfordshire. GARARA also confirmed that online learning was not

available in PhD programs and that the student number MCSHANE claims was assigned to her was not a valid student number for University of Hertfordshire.

12. MCSHANE served as a CFI in numerous other domestic relations cases in Colorado. In each of those cases, MCSHANE filed mandatory disclosures in which she represented that she held a PhD. She did so by using the acronym in her signature block for the mandatory disclosure, as well as on the Certificate of Service.
13. The following table shows some, but not all, of the domestic relations cases in which MCSHANE filed mandatory disclosures.

<b><u>Date Filed</u></b>	<b><u>Jurisdiction</u></b>	<b><u>Case Number</u></b>	<b><u>Judicial Officer</u></b>
2/18/22	Weld County	21DR30566	Judge Kimberly Baird Schutt
5/9/22	Logan County	22DR12	Magistrate Matthew W. E. Bradley Judge Stephanie M. G. Gagliano
5/10/22	Mesa County	19DR43	Magistrate Kevin Richard Kennedy
5/31/22	Larimer County	19DR30157	Magistrate Kandace Bradner Majoros
6/21/22	El Paso County	22DR119	Magistrate Lauren Carol Bynum
7/27/22	Boulder	22DR603	Judge Dea M. Lindsey
9/27/22	Adams	12DR2118	Magistrate Ashley Ratliff
9/28/22	Denver	20DR30834	Judge Anita Marie Schutte
10/13/22	Arapahoe	22DR30627	Judge Cajardo R. Lindsey
10/18/22	El Paso	19DR2384	Judge Amanda J. Philipps
1/9/23	Delta County	18DR54	Magistrate Kellie L. Starritt
1/13/23	El Paso County	21DR32424	Judge Diana K. May
1/17/23	Kiowa County	20DR11	Judge Tarryn L. Johnson
1/18/23	El Paso County	22DR31236	Judge Chad Clayton Miller

14. The record further reveals that MCSHANE testified under oath that she held a PhD and filed other documents with the courts representing that she held a PhD.
15. Despite MCSHANE's submissions of documents to various courts and state agencies that purport to be issued by the University of Hertfordshire, GARARA has maintained that the documents are fraudulent and MCSHANE never attended the university.

**I. DEPARTMENT OF REGULATORY AGENCIES**

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

On or about and between August 28, 2017 to July 20, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Executive Directors Marguerite Salazar and/or Patty Salazar of the Colorado Department of Regulatory Agencies (“DORA”), each a public servant, and/or their employees, agents, and/or designees by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

**COUNT TWO**  
**FORGERY**  
**C.R.S. § 18-5-102(1)(d) (F5)**

On or about and between August 28, 2017 to July 20, 2023, in and triable in the State of Colorado, SHANNON MCSHANE, with the intent to defraud the Colorado Department of Regulatory Agencies (“DORA”), 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 public record or instrument, namely: licensure applications and corresponding supporting documents, filed, required by law to be filed, or legally fileable in or with the Colorado Department of Regulatory Agencies, a public office or public servant, in violation of section 18-5-102(1)(d), C.R.S.

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

16. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts One and Two by this reference.
17. Individuals who want to work in certain professions in the State of Colorado must obtain licensure through DORA. Those individuals must submit an application, which is then

reviewed by a licensing specialist. The board for that particular profession makes the decision as to whether an individual should receive a license. In MCSHANE's desired professions, it was the board that oversaw mental health professions. Applicants for DORA licensure attest to the accuracy of the information contained in the licensure applications.

18. Starting on September 22, 2017 and continuing throughout 2021, MCSHANE submitted applications for Certified Addiction Counselor II, Licensed Addiction Counselor, Psychologist Candidate, and Licensed Psychologist. In each application, MCSHANE attested that she was submitting information that was true and correct to the best of her knowledge, and/or that she was doing so under the penalty of perjury.
19. In the application for Psychologist Candidate, Licensed Psychologist, and Certified Addiction Counselor II, MCSHANE represented that she possessed a PhD from the University of Hertfordshire in the United Kingdom. She stated that she received the PhD on various dates in the year 2017. However, her application for Licensed Addiction Counselor submitted on July 20, 2021, she indicated that her highest level of education was a Clinical Master's Degree in Behavioral Health Sciences from Texas State University conferred May 26, 2021.
20. Furthermore, the applications for Licensed Addiction Counselor, Certified Addiction Counselor II, and Licensed Psychologist required that the applicant complete a minimum amount of hours of work experience under appropriate supervision.
21. The supervision hours were required to be submitted using a specific form, which MCSHANE did submit. She submitted three Completed Post-Doctoral Experience and Supervision forms stating that she received supervision from three separate psychologists: Colton L. McNutt, PsyD ("MCNUTT"), Christopher Estep, PsyD ("ESTEP"), and Angelina Johnson, PsyD ("JOHNSON").
22. In both emails and interviews, MCNUTT and JOHNSON denied supervising MCSHANE for the amount of hours documented. MCNUTT stated he did not have a written supervision agreement with her. JOHNSON stated that she had a written agreement with MCSHANE, but told her if she missed an appointment or stood her up, the agreement would end. MCSHANE failed to keep an appointment with JOHNSON, and the



supervision agreement ended. Both MCNUTT and JOHNSON denied signing the forms that MCSHANE had submitted to DORA.

23. ESTEP said he supervised MCSHANE a few times, but after seeing the form did not recall supervising her for the 880 hours documented. ESTEP looked for a written supervision agreement with MCSHANE but was unable to locate such an agreement.
24. As part of the application MCSHANE submitted on September 22, 2017 for Certified Addiction Counselor II, MCSHANE provided a form titled Clinically Supervised Work Experience. Therein, she stated that she had been supervised for 2,000 hours by “Nicole E. Sommerman-Borne, QA, LCDC” (“SOMMERMAN-BORNE”) and that the supervision occurred at “Gateway Foundation Corrections” in Kyle, Texas from July 15, 2016 – July 25, 2017. SOMMERMAN-BORNE informed an investigator that she had not supervised MCSHANE, and that they had worked in different wings of the correctional facility. Furthermore, SOMMERMAN-BORNE stated that her title on the form MCSHANE submitted was incorrect. Specifically, she did not know what the acronym “QA” meant. Finally, SOMMERMAN-BORNE denied signing the form MCSHANE submitted to DORA.
25. On February 15, 2023, Chad Kullhem (“KULLHEM”) filed a complaint with DORA regarding MCSHANE. KULLHEM was a party to Arapahoe County 22DR30627 in which MCSHANE had been appointed as a CFI. In his complaint, KULLHEM stated that “Ms. MCSHANE’s PhD is not verifiable” and explained that “[s]he says she got her PhD in Psychology in 2017, however this not possible as she was also in Texas during this time. She studied for her master’s after 2017 at Texas State University.”
26. KULLHEM included detailed correspondence with Roxanne Garara (“GARARA”), Associate Director of Academic Services at the University of Hertfordshire. On March 7, 2023, GARARA sent KULLHEM an email that stated in part, “I can confirm that the University has no record of any student with the name Shannon MCSHANE.”
27. MCSHANE also submitted a transcript to DORA that purports to be from the University of Hertfordshire that lists a student number as 11051874 as well as classes listed under the heading “Module.” GARARA further stated in her email to KULLHEM, “I can also confirm that the transcript documentation you have provided was not issued by the University of Hertfordshire as research degrees do not have modules and transcripts.”

The record also indicates that GARARA told investigators the same information on a different date. That is, research degrees do not have modules or transcripts.

28. KULLHEM's complaint also stated that MCSHANE did not have a thesis or dissertation and that the title of her purported dissertation listed on her CV – “Bystander Effect of Workplace Bullying, Perceived Employee Support and Work Engagement” – was written by someone else.
29. DORA issued an “Order of Summary Suspension Pursuant to Section 24-4-104, C.R.S.” on June 9, 2023. The order referenced three separate complaints against MCSHANE, with the final complaint alleging deficiencies in her work as a CFI.
30. The order also stated: “On or about June 2, 2023, the State Board of Psychologist Examiners reviewed and discussed [the Office of Investigations’] report, finding [MCSHANE] had submitted fraudulent documents in her application for a license to practice psychology; omitted information about past professional discipline from her application for a license to practice addiction counseling engaged in a substandard care; and practiced outside of her scope of training and expertise.”
31. On July 20, 2023, MCSHANE voluntarily relinquished her DORA licenses in a signed Stipulation and Final Agency Order. The order reads in part, “[a]lthough Respondent denies the above allegations, Respondent agrees that if the allegations were proven by the boards at hearing, Respondent would be found to have violated” sections involving prohibited activities such as misrepresentation and performing services outside of one’s area of training.
32. As a result of the Stipulation and Final Agency Order, MCSHANE permanently relinquished her licenses and the right to practice as a Licensed Psychologist and Licensed Addictions Counselor in the State of Colorado, effective July 20, 2023.

## II. COLORADO DEPARTMENT OF CORRECTIONS

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

On or about and between September 1, 2017 to March 1, 2021, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Executive Directors Rick Raemisch and/or Dean Williams of the Colorado Department of Corrections (“CDOC”), each a public servant, and/or their employees, agents, and/or designees by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

### **COUNT FOUR** **FORGERY** **C.R.S. § 18-5-102(1)(d) (F5)**

On or about and between September 1, 2017 to March 1, 2021, SHANNON MCSHANE, in and triable in the State of Colorado, with the intent to defraud the Colorado Department of Corrections (“CDOC”), 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 public record or instrument, namely: employment applications and corresponding supporting documents, filed, required by law to be filed, or legally fileable in or with the Colorado Department of Corrections, a public office or public servant, in violation of section 18-5-102(1)(d), C.R.S.

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

33. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Three and Four by this reference.
34. On or about November 17, 2017, MCSHANE submitted an employment application to CDOC to work as an addiction counselor. In the application she stated that she received a

“Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, United Kingdom. MCSHANE indicates on the application that she attended the University of Hertfordshire from January 2011 until January of 2017.

35. In the Supplemental Questions section of the application, MCSHANE again references her “Doctorate studies in Psychology.” MCSHANE further stated, “I am license eligible in Colorado and will be submitting my application for Psychologist Candidate status. Because I was preparing to relocate to Colorado at the time I received my PhD, I did not apply for the license in Texas.”
36. The record reveals that, per records received from U.S. Customs and Border Protection (“CBP”), MCSHANE had not traveled to the United Kingdom from January 1, 2002 – October 19, 2023.
37. Furthermore, GARARA indicated in an email that online programs for PhD study was not available during MCSHANE’s purported tenure at the University of Hertfordshire.
38. On or about February 7, 2019, MCSHANE submitted an employment application to CDOC to work as a psychologist candidate. MCSHANE again represented that she had a “Doctorate” in “Psychology” from the University of Hertfordshire in the United Kingdom. By submitting the February 2019 application, MCSHANE acknowledged that the information she provided was “true, complete and correct to the best of my knowledge and belief, and is made in good faith.”

### **III. COLORADO DEPARTMENT OF HUMAN SERVICES AND COLORADO MENTAL HEALTH INSTITUTE IN PUEBLO**

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

On or about and between December 3, 2019 to April 13, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Executive Director Michelle Barnes of the Colorado Department of Human Services (“CDHS”), a public servant, and/or their employees, agents, and/or designees by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a

matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

**COUNT SIX**  
**FORGERY**  
**C.R.S. § 18-5-102(1)(d) (F5)**

On or about and between December 3, 2019 to April 13, 2023, SHANNON MCSHANE, in and triable in the State of Colorado, with the intent to defraud the Colorado Department of Human Services (“CDHS”), 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 public record or instrument, namely: employment applications and corresponding supporting documents, filed, required by law to be filed, or legally fileable in or with the Colorado Department of Human Services, a public office or public servant, in violation of section 18-5-102(1)(d), C.R.S.

Facts that support the offenses set forth in Counts Five and Six above include, but are not limited to, the following:

39. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Five and Six by this reference.
40. On or about December 3, 2019, MCSHANE submitted an employment application for the position of Psychologist Candidate. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.
41. On or about May 6, 2020, MCSHANE submitted an employment application for the position of Psychologist Candidate. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.
42. On or about May 10, 2020, MCSHANE submitted an employment application for the position of Psychologist I. In the application she stated that she received a “Doctorate”

in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.

43. On or about July 16, 2021, MCSHANE submitted an employment application for the position of Pscychologist I – Forensic Evaluator. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.
44. On or about January 21, 2022, MCSHANE submitted an employment application for the position of Pscychologist II. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.
45. On or about April 29, 2022, MCSHANE submitted an employment application for the position of Pscychologist II. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.
46. On or about April 13, 2023, MCSHANE submitted an employment application for the position of Pscychologist I (Clinical Services) – CO Mental Health Hospital at Fort Logan. In the application she stated that she received a “Doctorate” in “Psychology” from the University of Hertfordshire in Hatfield, “International.” MCSHANE did not list dates of attendance at the university or a date when her degree was purportedly conferred.

#### **IV. OFFICE OF THE STATE COURT ADMINISTRATOR**

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

On or about and between August 3, 2021 to April 14, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Steven Vasconcellos, State Court Administrator, Office of the State Court Administrator, a public

servant, and/or his employees, agents, and/or designees by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

**COUNT EIGHT**  
**FORGERY**  
**C.R.S. § 18-5-102(1)(d) (F5)**

On or about and between August 3, 2021 to April 6, 2022, SHANNON MCSHANE, in and triable in the State of Colorado, with the intent to defraud the Office of the State Court Administrator 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 public record or instrument, namely: affidavits and supporting documents, filed, required by law to be filed, or legally fileable in or with the Office of the State Court Administrator, a public office or public servant, in violation of section 18-5-102(1)(d), C.R.S.

Facts that support the offenses set forth in Counts Seven and Eight above include, but are not limited to, the following:

47. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Seven and Eight by this reference.
48. On or about August 3, 2021, MCSHANE submitted an Affidavit of Mandatory Consent and Disclosure for Eligibility of Appointment as a CFI. Under the section heading titled "Personal Data" is the following question: "Have you ever been convicted of a traffic or petty offense involving drugs or alcohol, any misdemeanor, or any felony?" MCSHANE answered "No."
49. On April 1, 2022, MCSHANE submitted a Parental Responsibilities Evaluator (PRE) Affidavit. Under the section heading titled "Personal Data" is the following question: "Have you ever been convicted of a traffic or petty offense involving drugs or alcohol, any misdemeanor, or any felony?" MCSHANE again answered "No."

50. However, MCSHANE's September 22, 2017 DORA application for licensure to be a Certified Addictions Counselor II includes the following question and answer: "Have you ever received a deferred judgment or been convicted of or pled nolo contendere to a violation of any federal, state, or local law relating to the possession, manufacture, distribution, or dispensing of a controlled substance, or relating to drug abuse, including alcohol (DUI, DWI, DWAI, OWI)?" MCSHANE answered "yes."
51. MCSHANE went on to explain that she was "drugged at a party" and was pulled over "while fleeing a potential attacker." MCSHANE stated that the incident occurred January 1, 1989 and she "received a Misdemeanor Unclassified in 1989 for DWI" in Collin County, Texas. MCSHANE also provided a Texas Department of Public Safety Criminal History Search for her own name. The search confirms that MCSHANE does have a conviction for DWI and was sentenced in August 1989 in Collin County, Texas. The search also contains multiple photos of MCSHANE.
52. On March 21, 2023 CFI/PRE Program Director Jaime Watman ("WATMAN") signed a letter on the heading from the Office of the State Court Administrator informing "Dr. Shannon MCSHANE" that she had been permanently removed from the statewide rosters of PREs and CFIs.
53. WATMAN informed MCSHANE that among other reasons, part of the rationale for her removal was her failure to inform WATMAN of her pending DORA complaint. WATMAN also indicated in the letter that she had received information from the 8th and 19th Judicial Districts that raised concerns about MCSHANE's suitability for the statewide rosters.
54. MCSHANE responded to WATMAN via email on March 24, 2023 and called the DORA complaint "outrageous, traumatic, and upsetting." MCSHANE also stated that while she accepted the determination that she would not take any more cases (as a CFI or PRE), she was requesting permission to finish the more than 20 cases that were currently assigned.
55. MCSHANE further directed communication to the Judicial Branch when she sent a letter to Chief Justice Brian D. Boatright ("BOATRRIGHT") (c/o Sheryl L. Stevens, Clerk of the Supreme Court) on April 14, 2023. BOATRRIGHT was, at the time, Chief Justice of the Colorado Supreme Court. MCSHANE's letter expressed her shock at the DORA complaints and removal from the statewide rosters. MCSHANE also attached



documentation “[b]ecause an individual without adequate education and skills could not produce the kind of reports required by the Court in these domestic relations cases, I have included several items for your review, if interested.”

56. One such item was a purported equivalency evaluation from the service International Education Evaluations, or IEE. The evaluation stated that MCSHANE has a “Doctor of Philosophy degree in Clinical Psychology,” and that it was awarded in 2017.
57. However, the record reveals that an investigator contacted GARARA after receiving documents that were purportedly sent from the University of Hertfordshire and verified by IEE.
58. GARARA again confirmed that the documents were fraudulent.

## **V. LOGAN COUNTY CASE 22DR12**

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

On or about and between March 31, 2022 to July 27, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Magistrate Matthew W. E. Bradley, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

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

On or about and between March 31, 2022 to July 27, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Judge Stephanie M. G. Gagliano, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

**COUNT ELEVEN**  
**FORGERY**  
**C.R.S. § 18-5-102(1)(d) (F5)**

On or about and between March 31, 2022 to July 27, 2023, in and triable in the State of Colorado, SHANNON MCSHANE, with the intent to defraud the Logan County Clerk of the Court, 13th Judicial (Logan County) Magistrate Matthew W. E. Bradley, and/or a 13th Judicial (Logan County) District Court Judge Stephanie M. G. Gagliano, 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 public record or instrument, namely: Mandatory Disclosure Re: Appointment of a Child and Family Investigator Pursuant to § 14-10-116.5, C.R.S., filed, required by law to be filed, or legally fileable in or with the Logan County Clerk of the Court, a public office or public servant, in violation of section 18-5-102(1)(d), C.R.S.

**COUNT TWELVE**  
**PERJURY**  
**C.R.S. § 18-8-502 (F4)**

On or about and between July 26, 2022 to October 21, 2022, in the State of Colorado, SHANNON MCSHANE, knowingly, in any official proceeding, made a materially false statement, which she did not believe to be true, under an oath required or authorized by law; in violation of section 18-8-502, C.R.S.

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

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

**Magistrate Matthew W. E. Bradley**

60. Magistrate Matthew W. E. Bradley (“BRADLEY”) serves as a magistrate for the 13th Judicial District, which includes Logan County. BRADLEY presides over a variety of cases, to include domestic relations (“DR”) cases. He has presided over more than 1,000

domestic relations cases in his service as a magistrate and makes decisions in such cases that range from division of assets to allocation of parenting time and decision-making if children are involved. In child custody cases, he must consider the best interest of the child.

61. BRADLEY'S decisions in cases involving child custody are aided by CFIs and the degree to which he relies on a CFI varies by case. In some cases, the CFI report is close to the only evidence he has. However, BRADLEY stated the CFI reports are significant because theoretically the CFI is an independent person with no stake in the outcome. The Court should be able rely upon and trust CFIs to come to conclusion that is not biased toward either parent.
62. BRADLEY stated that when witnesses testify, they are required to take an oath to tell the truth. An oath helps a witness understand that they are about to testify in a significant proceeding. No witness is exempt from taking an oath.
63. BRADLEY is familiar with MCSHANE because she was appointed as a CFI in Logan County case 22DR12, which involved an allocation of parental responsibilities. As part of the motion to appoint MCSHANE as a CFI in that case, petitioner's counsel filed an exhibit containing MCSHANE's CV. The CV indicated that MCSHANE had received a PhD from the University of Hertfordshire.
64. BRADLEY subsequently issued a court order appointing MCSHANE as the CFI in the case. MCSHANE filed a disclosure, which BRADLEY stated is typical of CFIs because it determines whether a CFI has any relationship to any of the parties. MCSHANE signed the disclosure in 22DR12 with the acronyms PhD, LP, MSW, and LAC. BRADLEY stated that when someone files a document with the court, they believe everything in that document is true and correct to the best of their knowledge and belief. They are not allowed to include misleading statements or anything they know is not true. There are no exceptions to this rule for non-lawyers.
65. BRADLEY presided over a permanent orders hearing in 22DR12 on October 20, 2022 in which MCSHANE testified. BRADLEY recalled that she had authored a strong report in favor of one party over the other. BRADLEY stated it was probably the most one-sided report he had seen.

66. MCSHANE testified as an expert witness at the hearing and BRADLEY personally administered the oath. BRADLEY described MCSHANE's testimony as unbelievable in the sense that this situation was extraordinary and very scary. However, on cross-examination of MCSHANE, BRADLEY had deep concern for her credibility. He found that the report and testimony were so lopsided that he had MCSHANE removed from the roster of eligible CFIs in the 13th Judicial District.
67. BRADLEY also sent a letter to the District Attorney's office referring MCSHANE for criminal charges including but not limited to perjury and attempt to influence a public servant. BRADLEY also noted that MCSHANE had testified twice in 22DR12. When she testified before him, she asserted that she held a PhD. BRADLEY also noted that MCSHANE testified before Judge Gagliano in a separate hearing and that the Court's order calls her "Dr. MCSHANE."
68. BRADLEY researched MCSHANE's licenses on the DORA web site and learned that she had voluntarily relinquished her license. He did not know about the relinquishment until after his findings that she was not a credible witness. BRADLEY did not have any doubts about the validity of her credentials while 22DR12 was pending.

**Judge Stephanie M. G. Gagliano**

69. Although BRADLEY was assigned to 22DR12, he was not the only judge to preside over proceedings in that case.
70. Judge Stephanie M. G. Gagliano ("GAGLIANO") has served a District Court Judge for the 13th Judicial District for the past five years. GAGLIANO presides over a variety of cases, including criminal and domestic relations cases. GAGLIANO estimates that she has presided over hundreds of domestic relations cases in her tenure as a district court judge and makes decisions in those cases about allocation of parental responsibility and decision-making. GAGLIANO stated that she is required by law to consider the best interests of the children.
71. GAGLIANO also relies on CFIs in domestic relations cases because when parents do not agree in a custody case, the story is usually "he said/she said" and the truth is probably somewhere in the middle. The CFI is a valuable resource because they should not have bias and no investment in the outcome of the case.

72. GAGLIANO stated that in order for a witness to testify in any courtroom, the witness must take an oath to tell the truth before he or she takes the witness stand. The oath is administered every time, and a witness will not testify unless they swear under oath to tell the truth. No one is exempt from taking the oath.
73. GAGLIANO is familiar with MCSHANE because MCSHANE testified at an emergency hearing in 22DR12 on July 27, 2022. GAGLIANO administered the oath to tell the truth to MCSHANE, and MCSHANE swore to tell the truth. GAGLIANO recalls that MCSHANE testified to having a doctoral degree in psychology and that MCSHANE was a licensed psychologist.
74. GAGLIANO stated that she had to rely on MCSHANE's reasoning at the hearing and needed her opinion to help get GAGLIANO to a decision. GAGLIANO further stated that she was in a difficult position because she feared what would happen if she let the children go with one of the parties to the case.
75. After the hearing concluded GAGLIANO heard that MCSHANE's certificates, trainings and degrees were fake.

**VI. CHAD KULLHEM, ARAPAHOE COUNTY CASE 22DR30627**

**COUNT THIRTEEN**  
**RETALIATION AGAINST A VICTIM OR WITNESS**  
**C.R.S. § 18-8-706 (F3)**

On or about and between February 28, 2023 to April 14, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously used an act of harm or injury upon a person or property, which action was directed to or committed upon a witness in any civil or criminal proceeding, namely: Chad Kullhem, as retaliation or retribution against such witness or victim, in violation of section 18-8-706, C.R.S.

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

On or about and between October 11, 2022 to October 13, 2022, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence

Judge Cajardo R. Lindsey, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

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

76. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Thirteen through Fourteen by this reference.
77. Chad Kullhem (“KULLHEM”) is a respondent in an Arapahoe County, Colorado, domestic relations (22DR30627) in which MCSHANE was appointed as a CFI.
78. MCSHANE filed a mandatory disclosure in 22DR30627 with the Arapahoe County Clerk of Court. The signature block reads “Shannon MCSHANE, PhD” and the signature in the Certificate of Service also reads, “Shannon MCSHANE, PhD.”
79. KULLHEM became concerned about MCSHANE after his first interview with her and subsequently started to investigate her background. As a result of his investigation, he filed a complaint with DORA on February 15, 2023 based on concerns that MCSHANE’s PhD and dissertation were not verifiable.
80. Due to his fears of retaliation, KULLHEM filed the DORA complaint anonymously.
81. However, MCSHANE contacted KULLHEM’S employer on February 28, 2023 and accused him of “cyber-stalking [her] because [she] did not rule for him 100% in a custody evaluation.” MCSHANE also informed KULLHEM’S employer that she was “about to contact the judge in his divorce case to let him about his behavior...” but first wanted to talk to his employer “to determine if his actions on company time constitute a violation.”
82. In a later interview, KULLHEM expressed fear that he could still lose his job because of this situation, and he did not necessarily want his employer to know about his domestic relations case.
83. Upon her termination from the statewide CFI and PRE rosters, MCSHANE emailed an attorney listserv on March 26, 2023 and referenced KULLHEM’S case and his alleged behaviors. MCSHANE informed the listserv that the “Father” proceeded to “cyber-stalk”

MCSHANE, “install a keylogger program vis-à-vis an email with a virus and record everything I was doing,” “show up at my house,” and “create a cache for fake documents which he sent to DORA” that claim “I am not who I say I am,” and “I never attended college & faked all my degree documents – despite holding 4 different licenses with DORA and having had my applications approved without incident everytime.”

84. MCSHANE signed the email to the listserv as “Shannon MCSHANE, PhD, LP, MSW, LAC.”
85. MCSHANE also wrote about KULLHEM in her letter to BOATRIGHT on April 14, 2023. Therein, she stated, “This Party produced a multitude of questionable documents and I immediately asked all Counsels to allow me to rebut his allegations.” Again, she signed the letter “Shannon MCSHANE, PhD, LP, MSW, LAC.”
86. The record reveals that in the time KULLHEM and MCSHANE were acquainted, neither the El Paso County Sheriff’s Office nor the Monument Police Department responded to MCSHANE’s home for a call involving KULLHEM.
87. Mr. Kullhem was able to identify a photo of MCSHANE. The photo did not contain any identifying information or words.

## **VII. ADDITIONAL COLORADO DOMESTIC RELATIONS CASES**

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

On or about and between February 18, 2022 to July 20, 2023, in and triable in the State of Colorado, SHANNON MCSHANE unlawfully and feloniously attempted to influence Judge Kimberly Baird Schutt, Magistrate Kevin Richard Kennedy, Magistrate Kandace Bradner Majoros, Magistrate Lauren Carol Bynum, Judge Dea M. Lindsey, Magistrate Ashley Ratliff, Judge Anita Marie Schutte, Judge Amanda J. Philipps, Magistrate Kellie L. Starritt, Judge Diana K. May, Judge Tarryn L. Johnson, and/or Judge Chad Clayton Miller, each a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member, in violation of section 18-8-306, C.R.S.

Facts that support the offenses set forth in Count Fifteen above include, but are not limited to, the following:

88. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Count Fifteen by this reference.
89. The record further reveals, and by her own admissions, that MCSHANE served as a CFI and/or PRE in more than twenty-five cases.
90. MCSHANE filed mandatory disclosures in each of the cases referenced in Count Fifteen.
91. The format of mandatory disclosures were similar to each other, as well as similar to the disclosures filed in Logan County 22DR12 and Arapahoe County 22DR30627. On each signature block, MCSHANE signed “Shannon MCSHANE, PhD” or “Shannon MCSHANE, PhD, LP, MSW, LAC.”
92. MCSHANE also signed the Certificates of Service in a similar manner, and always indicated either in signature form or in the signature block that she held a PhD.
93. The record has revealed that MCSHANE did not, in fact, earn a PhD.



PHILIP J. WEISER  
ATTORNEY GENERAL



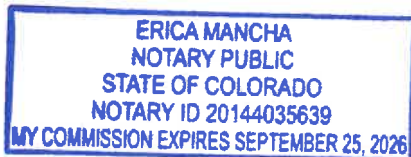
GWENN SANDROCK, Reg. No. 43283  
Senior Assistant Attorney General  
Criminal Justice Section

Subscribed and sworn before me in the City and County of Denver, State of Colorado, this  
29<sup>th</sup> day of August, 2024.

  
NOTARY PUBLIC

SEAL

My commission expires: 9/25/2026



The 2023 – 2024 State Grand Jury presents the within Indictment, and the same is hereby

Ordered filed this 29<sup>th</sup> day of August, 2024.

Pursuant to C.R.S. 13073-107, the Court hereby designates the County of  
Denver, Colorado as the county of venue for the purposes of trial.



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CHRISTOPHER J. BAUMANN  
Chief Judge, Second Judicial District