

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO 1437 Bannock Street Denver, CO 80202	
<hr/> THE PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. LAUREN WILSON , also known as LOREN WILSON , Defendant.	
<hr/> PHILIP J. WEISER, Attorney General MICHAEL J. MCCARTHY, Assistant Attorney General, Reg. No. 60025* 1300 Broadway, 9 th Floor Denver, CO 80203 Tel. 720-508-6701 * Counsel of Record	<div style="text-align: center;">Δ COURT USE ONLY Δ</div> <hr/> Case No.: GJ Case No.: 24CR0001 Courtroom: 259
COLORADO STATE GRAND JURY INDICTMENT	

Of the 2024-2025 term of the Denver District Court in the year 2025; the 2024-2025 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:

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| COUNT 1 | ATTEMPT TO INFLUENCE A PUBLIC SERVANT,
C.R.S. 18-8-306 [F4] 24051 |
| COUNT 2 | FORGERY OF A GOVERNMENT ISSUED DOCUMENT,
C.R.S. 18-5-102(1)(E) [F5] 1001E |
| COUNT 3 | FORGERY OF A GOVERNMENT ISSUED DOCUMENT,
C.R.S. 18-5-102(1)(E) [F5] 1001E |
| COUNT 4 | UNAUTHORIZED PRACTICE OF MEDICINE, FRAUDULENTLY
REPRESENTING AS A CERTIFIED PROFESSIONAL
C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96 |

- COUNT 5 UNAUTHORIZED PRACTICE OF MEDICINE, FRAUDULENTLY
REPRESENTING AS A CERTIFIED PROFESSIONAL
C.R.S. 12-20-407(1)(e)(VI) [F6] **51A96**
- COUNT 6 UNAUTHORIZED PRACTICE OF MEDICINE, FRAUDULENTLY
REPRESENTING AS A CERTIFIED PROFESSIONAL
C.R.S. 12-20-407(1)(e)(VI) [F6] **51A96**
- COUNT 7 UNAUTHORIZED PRACTICE OF MEDICINE, FRAUDULENTLY
REPRESENTING AS A CERTIFIED PROFESSIONAL
C.R.S. 12-20-407(1)(e)(VI) [F6] **51A96**
- COUNT 8 UNAUTHORIZED PRACTICE OF MEDICINE, FRAUDULENTLY
REPRESENTING AS A CERTIFIED PROFESSIONAL
C.R.S. 12-20-407(1)(e)(VI) [F6] **51A96**

ESSENTIAL FACTS RELATED TO ALL COUNTS

A. EMS Certification and the Practice of Medicine in Colorado

1. Colorado law defines the practice of medicine to include the following:

Holding out one's self to the public within this state as being able to diagnose, treat, prescribe for, palliate, or prevent any human disease; ailment; pain; injury; deformity; physical condition; or behavioral, mental health, or substance use disorder, whether by the use of drugs, surgery, manipulation, electricity, telemedicine, the interpretation of tests, including primary diagnosis of pathology specimens, images, or photographs, or any physical, mechanical, or other means whatsoever; [or]

Suggesting, recommending, prescribing, or administering any form of treatment, operation, or healing for the intended palliation, relief, or cure of a person's physical disease; ailment; injury; condition; or behavioral, mental health, or substance use disorder

§ 12-240-107(1)(a), (b), C.R.S.

2. To lawfully practice medicine in Colorado, a person must either have a medical license or fall under a statutory exemption from the licensing requirement. § 12-240-107(1)(a), (b), C.R.S. One such exception is the rendering of services by a certified or licensed emergency medical service (hereinafter, "EMS") provider, so long

as the services are consistent with the duties and functions of EMS providers.¹ See § 12-240-107(3)(w), C.R.S.

3. The Colorado Department of Public Health and Environment (hereinafter, “CDPHE”) is responsible for certifying EMS providers in Colorado. § 25-3.5-203(b), C.R.S. Among other factors, CDPHE is required by law to consider an applicant’s criminal history to determine whether the applicant has committed a crime of moral turpitude that “disqualifies the applicant from certification or licensure.” § 25-3.5-203(b)(III), C.R.S.

4. A person who is certified to provide EMS is sometimes referred to as an emergency medical technician, or “EMT.” CDPHE offers several levels of EMS certification, including the following: basic EMT certification (authorizing basic life support services); EMT certification with IV authorization (permitting intravenous therapy); advanced EMT certification (authorizing intermediate life support services); and paramedic certification (authorizing advanced life support services). CDPHE’s EMS certifications expire and are subject to renewal every three years.

B. Lauren Wilson’s Criminal Conduct

5. On June 15, 2009, CDPHE issued a paramedic certificate to Lauren Wilson. In or around 2011, CDPHE became aware that Wilson had a criminal history under the name “Loren Wilson” that constituted grounds to revoke his certification. On June 15, 2012, before CDPHE could complete the revocation process, Wilson’s paramedic certificate expired. He has not been certified or licensed to provide EMS services in Colorado since that date.

6. Wilson was born on November 28, 1971. On or about May 10, 2021, Wilson applied for the job of education director at a company called Action Medical LLC (hereinafter, “Action Medical”). As part of his application, Wilson submitted a résumé and other documents that falsely represented that he was certified as a paramedic. Wilson also provided documents that falsely listed his birth date as November 8, 1971, including one purporting to be a printout of an electronic version of his Colorado driver license, with the apparent purpose of concealing his criminal history. Based on these false representations, the company hired Wilson.

7. On July 12, 2022, Wilson was hired by Metro Care Ambulance LLC (hereinafter, “Metro Care”) as a paramedic and EMS education director. To obtain this position, Wilson again submitted paperwork falsely representing that he was certified as a paramedic and that his birth date was November 8, 2021.

¹ An EMS license reflects that the provider has completed a four-year bachelor’s degree in health sciences or an equivalent degree. There is no difference between an EMS certificate and an EMT license in terms of the scope of practice or the duration of the certificate or license.

8. Between July 12, 2022, and September 28, 2022, despite his lack of an EMS certificate or license, Wilson worked as a paramedic for Metro Care and provided medical care to over one hundred patients. In most instances, Wilson was the only purported paramedic in the ambulance and thus was the only person supposedly certified to provide advanced life support. On numerous occasions, Wilson's ambulance transported nursing-home residents who were in critical condition to hospital emergency rooms. On some occasions, patients were transported to a hospital unwillingly or without consent. On other occasions, Wilson provided intravenous therapy—medical care requiring a specific type of EMT authorization—to patients during transport. And on one occasion, Wilson administered oxygen through a preexisting cricothyrotomy opening in a patient's neck.

9. On August 2, 2022, Wilson applied to CDPHE to be the education program gatekeeper for Metro Care—a position that does not require EMS certification. In his application, he truthfully listed his birth date as November 28, 1971.

10. On September 29, 2022, Wilson reapplied for paramedic certification. In his application to CDPHE, Wilson falsely represented that he had never been charged or convicted of a misdemeanor or felony offense in Colorado or another state. On the same date, Wilson logged into a CDPHE online portal and changed his listed birth date from November 28, 1971, to November 8, 1971. Wilson also emailed CDPHE a name-based background report by the Colorado Bureau of Investigation (hereinafter, "CBI") that was based on the false birth date of November 8, 1971. Because Wilson did not request a background report using his true birth date, the CBI report did not identify any of his criminal history.

11. Hours after Wilson submitted his paramedic application, CDPHE sent him a "cease and desist" letter instructing him to cease providing EMS services. On December 21, 2022, CDPHE denied Wilson's paramedic application.

12. CDPHE are headquartered in the City and County of Denver in the State of Colorado. Action Medical and Metro Care are headquartered in Arapahoe County in the State of Colorado.

COUNT 1

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051

On or about September 29, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously attempted to influence a public servant, namely, Jill Hunsaker Ryan, Executive Director of the Colorado Department of Public Health and Environment, and/or her agents, employees, and 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 2
FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E)
[F5] 1001E

On or about May 10, 2021, in the State of Colorado, Lauren Wilson, with the intent to defraud Action Medical LLC, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be a written instrument, namely: a Colorado driver license, officially issued or created by the Colorado Department of Revenue, Division of Motor Vehicles, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT 3
FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E)
[F5] 1001E

On or about July 12, 2022, in the State of Colorado, Lauren Wilson, with the intent to defraud Metro Care Ambulance LLC, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be a written instrument, namely: a Colorado driver license, officially issued or created by the Colorado Department of Revenue, Division of Motor Vehicles, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT 4
UNAUTHORIZED PRACTICE MEDICINE, FRAUDULENTLY REPRESENTING
AS A CERTIFIED PROFESSIONAL, C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96

On or about and between July 12, 2022, and July 28, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously practiced medicine and intentionally and fraudulently represented himself as a certified or licensed emergency medical service provider, in violation of section 12-20-407(e)(VI), C.R.S.

The essential facts in support of Count 4 include the following:

13. On at least 38 separate incidents between July 13, 2022, and July 27, 2022, Wilson served as a paramedic aboard an ambulance dispatched to provide medical care and/or transport patients requiring medical care. On most of these incidents, Wilson was the only purported paramedic on the crew. These incidents include, but are not limited to, the following:

Incident No. 1

(Run No. 68659; Grand Jury Ex. 1; Grand Jury Ex. 21 at Slide 27)

On or about July 13, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Aurora, Arapahoe County, Colorado, for a psychiatric/suicidal complaint regarding a 91-year-old patient. Wilson took vitals, performed the assessment, and determined that it was medically necessary to transport the patient, without her consent, by ambulance to the emergency room of a

hospital in Denver, Colorado, for purposes of obtaining an M1 hold. During transport, Wilson performed an assessment.

Incident No. 2

(Run No. 68674; Grand Jury Ex. 2; Grand Jury Ex. 21 at Slide 28)

On or about July 13, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, for a psychiatric/suicidal complaint regarding a 52-year-old patient who was in critical (red) condition. Wilson took vitals, performed the assessment, and determined that it was medically justified to transport the patient by ambulance to the emergency room of a hospital in Denver, Colorado. During transport, Wilson performed an assessment.

Incident No. 3

(Run No. 69093; G.J. Ex. 3; G.J. Ex. 21 at Slide 29)

On or about July 26, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Lakewood, Jefferson County, Colorado, regarding an 84-year-old patient who was in critical (red) condition with low blood oxygen and reportedly having breathing problems. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Denver, Colorado. During transport, Wilson performed an assessment and administered oxygen and saline via inhalation (nebulizer).

Incident No. 4

(Run No. 69114; G.J. Ex. 4; G.J. Ex. 21 at Slide 30)

On or about July 26, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding an 84-year-old patient who was in critical (red) condition, unconscious, and breathing rapidly. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Denver, Colorado. During transport, Wilson performed an assessment and administered oxygen.

COUNT 5

**UNAUTHORIZED PRACTICE MEDICINE, FRAUDULENTLY REPRESENTING
AS A CERTIFIED PROFESSIONAL, C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96**

On or about and between August 3 2022, and August 10, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously practiced medicine and intentionally and fraudulently represented himself as a certified or licensed emergency medical service provider, in violation of section 12-20-407(e)(VI), C.R.S.

The essential facts in support of Count 5 include the following:

14. On at least 24 separate incidents between August 3, 2022, and August 9, 2022, Wilson served as a paramedic aboard an ambulance dispatched to provide medical care and/or transport patients requiring medical care. On most of these incidents, Wilson was the only purported paramedic on the crew. These incidents include, but are not limited to, the following:

Incident No. 5

(Run No. 69386; Grand Jury Ex. 5; Grand Jury Ex. 21 at Slide 32)

On or about August 3, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Aurora, Arapahoe County, Colorado, regarding a 94-year-old patient who was in critical (red) condition and experiencing leg pain. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered IV therapy (saline) and oxygen.

Incident No. 6

(Run No. 69391; Grand Jury Ex. 6; Grand Jury Ex. 21 at Slide 33)

On or about August 3, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Aurora, Arapahoe County, Colorado, regarding an 86-year-old patient who was in critical (red) condition and reportedly having trouble breathing, although exam findings were normal. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered oxygen.

Incident No. 7

(Run No. 69545; Grand Jury Ex. 7; Grand Jury Ex. 21 at Slide 34)

On or about August 9, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Littleton, Arapahoe County, Colorado, regarding an 86-year-old patient who was in critical (red) condition and who had a bandaged laceration on her head after suffering a fall. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Englewood, Arapahoe County, Colorado. During transport, Wilson performed an assessment.

Incident No. 8

(Run No. 69607; Grand Jury Ex. 8; Grand Jury Ex. 21 at Slide 35)

On or about August 10, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Centennial, Arapahoe County, Colorado, regarding

a bedridden, 67-year-old patient who was in emergent (yellow) condition and having post-operation complications. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Englewood, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered oxygen.

COUNT 6

UNAUTHORIZED PRACTICE MEDICINE, FRAUDULENTLY REPRESENTING AS A CERTIFIED PROFESSIONAL, C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96

On or about and between August 15, 2022, and August 29, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously practiced medicine and intentionally and fraudulently represented himself as a certified or licensed emergency medical service provider, in violation of section 12-20-407(e)(VI), C.R.S.

The essential facts in support of Count 5 include the following:

15. On at least 13 incidents between August 15, 2022, and August 29, 2022, Wilson served as a paramedic aboard an ambulance dispatched to provide medical care and/or transport patients requiring medical care. On most of these incidents, Wilson was the only purported paramedic on the crew. These incidents include, but are not limited to, the following:

Incident No. 9

(Run Nos. 69621 and 69622; Grand Jury Ex. 9; Grand Jury Ex. 21 at Slide 37)

On or about August 15, 2022, an ambulance with Lauren Wilson aboard was dispatched to a hospital in Denver, Colorado, to transport a 63-year-old patient to a different hospital in Highlands Ranch, Douglas County, Colorado. Wilson was the only purported paramedic aboard the ambulance. During transport, Wilson took vitals, performed the assessment, and administered oxygen through a pre-existing cricothyrotomy tube.

Later that day, the same ambulance with Wilson aboard was dispatched to return the patient to his original hospital in Denver, Colorado. By the time they had arrived back at the original hospital, the patient's condition had worsened to urgent (yellow) condition.

Incident No. 10

(Run No. 69810; Grand Jury Ex. 10; Grand Jury Ex. 21 at Slide 38)

On or about August 17, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Englewood, Arapahoe County, Colorado, regarding a 69-year-old patient who was in emergent (yellow) condition and suffering pain and a displaced hip following a fall. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was

medically justified to transport the patient to the emergency room of a hospital in Englewood, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered oxygen.

Incident No. 11

(Run No. 69828; Grand Jury Ex. 11; Grand Jury Ex. 21 at Slide 39)

On or about August 17, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Aurora, Arapahoe County, Colorado, for a psychiatric complaint regarding a 59-year-old patient who was refusing to eat for several days. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Adams County, Colorado. During transport, Wilson performed an assessment, inserted a peripheral IV, and administered IV therapy (saline) and oxygen.

Incident No. 12

(Run No. 70171; Grand Jury Ex. 12; Grand Jury Ex. 21 at Slide 40)

On or about August 17, 2022, an ambulance with only Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding a severely dehydrated 92-year-old patient. The nursing home had called for an ambulance after making several unsuccessful attempts to establish IV therapy. On the scene, Wilson took vitals, performed the assessment and inserted a peripheral IV.

COUNT 7

**UNAUTHORIZED PRACTICE MEDICINE, FRAUDULENTLY REPRESENTING
AS A CERTIFIED PROFESSIONAL, C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96**

On or about and between September 12, 2022, and September 20, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously practiced medicine and intentionally and fraudulently represented himself as a certified or licensed emergency medical service provider, in violation of section 12-20-407(e)(VI), C.R.S.

The essential facts in support of Count 5 include the following:

16. On at least 25 separate incidents between September 12, 2022, and September 19, 2022, Wilson served as a paramedic aboard an ambulance dispatched to provide medical care and/or transport patients requiring medical care. On most of these occasions, Wilson was the only purported paramedic on the crew. These incidents include, but are not limited to, the following:

Incident No. 13

(Run No. 70725; Grand Jury Ex. 13; Grand Jury Ex. 21 at Slide 42)

On or about September 14, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Aurora, Arapahoe County, Colorado, regarding a 49-year-old patient who required a computed tomography (also known as “CT” or “CAT”) scan of her head. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to a hospital in Aurora, Arapahoe County, Colorado. During transport, Wilson performed an assessment. When the patient arrived at the hospital, the patient’s condition had worsened to emergent (yellow) condition.

Incident No. 14

(Run No. 70735; Grand Jury Ex. 14; Grand Jury Ex. 21 at Slide 43)

On or about September 14, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding a 87-year-old patient in emergent (yellow) condition and respiratory distress, including fluid in her lungs and trouble breathing. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Adams County, Colorado. During transport, Wilson performed an assessment and administered saline via inhalation and oxygen.

Incident No. 15

(Run No. 70838; Grand Jury Ex. 15; Grand Jury Ex. 21 at Slide 44)

On or about September 19, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding a 74-year-old patient in critical (red) condition who had unusually low oxygen levels in her blood and was less alert than usual. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Englewood, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered oxygen and a 4-lead electrocardiogram (hereinafter, “ECG”).

Incident No. 16

(Run No. 70882; Grand Jury Ex. 16; Grand Jury Ex. 21 at Slide 45)

On or about September 21, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding a 72-year-old patient in critical (red) condition who was unable to move or communicate other than squeezing of hands and blinking of eyes. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital

in Denver, Colorado. During transport, Wilson performed an assessment and administered IV therapy, oxygen, and a 4-lead ECG.

COUNT 8

UNAUTHORIZED PRACTICE MEDICINE, FRAUDULENTLY REPRESENTING AS A CERTIFIED PROFESSIONAL, C.R.S. 12-20-407(1)(e)(VI) [F6] 51A96

On or about and between September 21, 2022, and September 28, 2022, in the State of Colorado, Lauren Wilson unlawfully and feloniously practiced medicine and intentionally and fraudulently represented himself as a certified or licensed emergency medical service provider, in violation of section 12-20-407(e)(VI), C.R.S.

The essential facts in support of Count 5 include the following:

17. On at least 11 separate incidents between September 21, 2022, and September 28, 2022, Wilson served as a paramedic aboard an ambulance dispatched to provide medical care and/or transport patients requiring medical care. On most of these occasions, Wilson was the only purported paramedic on the crew. These incidents include, but are not limited to, the following:

Incident No. 17

(Run No. 70933; Grand Jury Ex. 17; Grand Jury Ex. 21 at Slide 47)

On or about September 21, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding an 85-year-old patient who was suffering nausea, vomiting, and diarrhea following an infection and removal from antibiotics. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered ondansetron (a medicine used to treat vomiting) via IV therapy, oxygen, and a 4-lead ECG.

Incident No. 18

(Run No. 71091; Grand Jury Ex. 18; Grand Jury Ex. 21 at Slide 48)

On or about September 27, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding a 78-year-old patient in critical (red) condition with low blood oxygen. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Adams County, Colorado. The patient initially refused care and did not want to go to the hospital. During transport, Wilson performed an assessment and administered oxygen.

Incident No. 19

(Run No. 71120; Grand Jury Ex. 19; Grand Jury Ex. 21 at Slide 49)

On or about September 28, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Denver, Colorado, regarding an 83-year-old patient in critical (red) condition. The nursing home had reported that the patient had a fever and high blood pressure. Wilson took vitals and performed the assessment. The vitals taken by Wilson were acceptable, showing no fever and normal blood pressure for the patient; the patient stated he had no complaints. Nonetheless, staff at the nursing home wanted the patient to be taken to the hospital, and Wilson determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Adams County, Colorado. During transport, Wilson performed an assessment, installed a peripheral IV in the patient's left hand and administered oxygen and a 4-lead ECG.

Incident No. 20

(Run No. 71142; Grand Jury Ex. 20; Grand Jury Ex. 21 at Slide 50)


On or about September 28, 2022, an ambulance with Lauren Wilson aboard was dispatched to a nursing home in Greenwood Village, Arapahoe County, Colorado, regarding a bedridden 57-year-old patient in critical (red) condition, who was suffering from back pain and late-stage bladder and ovarian cancer. Wilson was the only purported paramedic aboard the ambulance. Wilson took vitals, performed the assessment, and determined it was medically justified to transport the patient to the emergency room of a hospital in Aurora, Arapahoe County, Colorado. During transport, Wilson performed an assessment and administered oxygen and a 4-lead ECG.

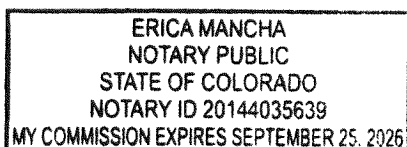
PHILIP J. WEISER
Attorney General


MICHAEL MCCARTHY, #60025

Assistant Attorney General
Special Prosecutions Unit
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado,
this 1st day of May, 2025.


Notary Public



My commission expires: 9/25/2026

The 2024-2025 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 1st day of May, 2025.

Pursuant to § 13-73-107, C.R.S., the Court designates Arapahoe County, Colorado as the county of venue for the purposes of trial.



Hon. Christopher J. Baumann
Presiding Judge, Statewide Grand Jury