

REDACTED

<b>DISTRICT COURT, EL PASO COUNTY COLORADO</b> Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903	<b>▲ COURT USE ONLY ▲</b> Case/File Number:  23CR4856
The People of the State of Colorado, Plaintiff V. Carie Hallford, DOB                        SSN:                      Defendant	Division: <b>Criminal</b> Crm:
Agency Name: <b>Colorado Bureau of Investigation</b> Agency Number: <b>2023-427</b>	
<b>ATTACHMENT A</b>	

The following Affidavit is submitted to the Court to document the probable cause in support of a request for the issuance of an Arrest Warrant for **Hallford, Carie** DOB \_\_\_\_\_ SSN: \_\_\_\_\_

This offense is fully documented in Colorado Bureau of Investigation Offense Report **2023-427** detailing the offense(s) of:

- § 18-13-101(1)(b) (Abuse of a corpse, treatment, F6) **190 counts**
- § 18-4-401(1)(b) (Theft) **1 count F5** 18-4-401(1)(b);(2)(f), **4 counts F6**
- § 18-5-309(1)(a)(II)(A)(Money Laundering, F3) **4 counts**
- § 18-5-102(1)(e) (Forgery, F5) **61 Counts**

With the victim(s) of Theft identified as:

1. Your Affiant is Agent Christopher Adams, a duly sworn and state-certified Agent with the Colorado Bureau of Investigation (CBI). Your Affiant has been employed in law enforcement for over 19 years. I have been employed by CBI since 2019. Prior to my employment with CBI, I was employed by the Woodland Park Police Department for 15 years. During my law enforcement career, I have investigated multiple homicide cases, authored and executed search warrants for physical and digital evidence, conducted interviews, and have received formal training in methods of police investigation.
2. I have also relied on other investigators from outside Agencies. The facts in this Affidavit come from personal observations, training and experience, and information obtained from other agents, law enforcement officials, and witnesses. Some of this Affidavit is derived from information provided to me by other CBI Agents, Fremont County Sheriff's Office (FCSO) and FBI Agents.
3. Although much of this Affidavit was prepared by FBI SA Andrew Cohen, I have reviewed the below facts carefully, and have no reason to doubt any investigator's accuracy or truthfulness in their reports. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. I submit the following facts demonstrate probable cause to believe that on or about between September 9, 2023 and October 4, 2023, with acts in furtherance of the violations in the county of El Paso, in the State and District of Colorado, the defendant, Carie Hallford, did commit the following offense:

§ 18-13-101(1)(b) (Abuse of a corpse, treatment, F6) 190 counts

ID	Initials	Date of Death	Days to Recovery	Death Certificate Reported Disposal Type	Abuse of Corpse Count
A1				CREMATION	1
A2				CREMATION	2
A3				CREMATION	3
A4				CREMATION	4
A5				CREMATION	5
A6				CREMATION	6
A7					7
A8				CREMATION	8
A9				CREMATION	9
A10				CREMATION	10
A11					11
A12				CREMATION	12
A13					13
A14				CREMATION	14
A15				CREMATION	15
A16					16
A17					17
A18				CREMATION	18
A19				CREMATION	19
A20					20
B1				CREMATION	21
B2				CREMATION	22
B3				CREMATION	23
B4				CREMATION	24
B5				CREMATION	25
B6					26
B7					27
B8				CREMATION	28
B9					29
B10					30
B11				CREMATION	31
B12					32
B13				CREMATION	33
B14					34
B15				CREMATION	35
B16				CREMATION	36

ID	Initials	Date of Death	Days to Recovery	Death Certificate Reported Disposal Type	Abuse of Corpse Count
B17					37
B18					38
B19					39
B20				CREMATION	40
C1				CREMATION	41
C2				CREMATION	42
C3				CREMATION	43
C4				CREMATION	44
C5				CREMATION	45
C6				CREMATION	46
C7				CREMATION	47
D1				CREMATION	48
D2				CREMATION	49
D3				CREMATION	50
D4				CREMATION	51
D5				CREMATION	52
D6				CREMATION	53
D7				CREMATION	54
D8				CREMATION	55
D9				CREMATION	56
E1				CREMATION	57
E2				CREMATION	58
E3				CREMATION	59
E4				CREMATION	60
E5				CREMATION	61
E6					62
E7				CREMATION	63
E8				CREMATION	64
E9				CREMATION	65
E10					66
E11				CREMATION	67
E12				CREMATION	68
E13				CREMATION	69
E14				CREMATION	70
E15				CREMATION	71
E16					72
E17					73
E18				CREMATION	74
E19				CREMATION	75
E20				CREMATION	76
E21				CREMATION	77

ID	Initials	Date of Death	Days to Recovery	Death Certificate Reported Disposal Type	Abuse of Corpse Count
E22				CREMATION	78
E23				CREMATION	79
E24				BURIAL- CEMETERY	80
E25				CREMATION	81
E26				CREMATION	82
E27				CREMATION	83
F1				CREMATION	84
G1				CREMATION	85
G2				CREMATION	86
G3					87
G4					88
G5				CREMATION	89
G6				CREMATION	90
G7					91
G8				CREMATION	92
G9				CREMATION	93
G10					94
G11				CREMATION	95
G12					96
G13					97
G14					98
G15				CREMATION	99
G16					100
G17					101
G18					102
H1				CREMATION	103
I1				CREMATION	104
I2					105
J1				CREMATION	106
J2					107
L1				CREMATION	108
L2				CREMATION	109
L3					110
L4				CREMATION	111
L5				CREMATION	112
L6				CREMATION	113
L7				CREMATION	114
L8					115
L9				CREMATION	116
L10				CREMATION	117

ID	Initials	Date of Death	Days to Recovery	Death Certificate Reported Disposal Type	Abuse of Corpse Count
L11					118
L12				CREMATION	119
L13				CREMATION	120
L14				CREMATION	121
L15					122
L16					123
L17					124
L19				CREMATION	125
L20				CREMATION	126
L21				CREMATION	127
L22				CREMATION	128
L23				CREMATION	129
L24					130
L25				CREMATION	131
L26				CREMATION	132
L27				CREMATION	133
L28				CREMATION	134
L29				CREMATION	135
L30					136
L31				CREMATION	137
L32				CREMATION	138
L33					139
L34				CREMATION	140
L35				CREMATION	141
L36					142
L37				CREMATION	143
L38					144
L39					145
L40				CREMATION	146
L41				CREMATION	147
L42					148
L43					149
L44					150
M1				CREMATION	151
M2				CREMATION	152
M3					153
M4				CREMATION	154
M5				CREMATION	155
M6				CREMATION	156
M7				CREMATION	157
M8				CREMATION	158

ID	Initials	Date of Death	Days to Recovery	Death Certificate Reported Disposal Type	Abuse of Corpse Count
M9				CREMATION	159
M10					160
M11					161
M12				CREMATION	162
M13				CREMATION	163
M15				CREMATION	164
M16				CREMATION	165
M17				CREMATION	166
M18				CREMATION	167
M19				CREMATION	168
M20				CREMATION	169
M21				CREMATION	170
M22				CREMATION	171
N1				CREMATION	172
N2				CREMATION	173
N3				CREMATION	174
N4				CREMATION	175
N5				CREMATION	176
N6				CREMATION	177
N7				CREMATION	178
N8				CREMATION	179
N9				CREMATION	180
N10				CREMATION	181
N11				CREMATION	182
N12					183
N13				CREMATION	184
N14				CREMATION	185
N15					186
N16				CREMATION	187
N17				CREMATION	188
N18				CREMATION	189
PP1				CREMATION	190

5. I submit the following facts demonstrate probable cause to believe that between November 7, 2020 and October 4, 2023, in the county of El Paso, in the State and District of Colorado, the defendant, Carie Hallford, did commit the following offense:

§ 18-5-102(1)(e) (Forgery, F5) 61 Counts

ID	Initials	Death Cert. Issued	Forgery Count
G15			1
C1			2
N11			3
N1			4
D1			5
D8			6
D2			7
A19			8
A18			9
B16			10
M1			11
G2			12
B2			13
M5			14
A2			15
M4			16
M7			17
F1			18
H1			19
B8			20
B11			21
C5			22
G1			23
B3			24
M2			25
G9			26
G8			27
M15			28
C3			29
B5			30
G11			31
M13			32
G6			33
M21			34
B1			35
M19			36
M22			37
M20			38
M18			39
M12			40
M17			41

ID	Initials	Death Cert. Issued	Forgery Count
B20			42
M16			43
G5			44
B4			45
M9			46
C2			47
M6			48
A3			49
M8			50
A1			51
A15			52
A8			53
A9			54
A10			55
A6			56
A4			57
A5			58
A14			59
A12			60
I1			61

6. I submit the following facts demonstrate probable cause to believe that between September 15, 2019 and October 4, 2023, in the county of El Paso, in the State and District of Colorado, the defendant, Carie Hallford, did commit the following offense:

§ 18-4-401(1)(b) (Theft) 1 count F5 18-4-401(1)(b);(2)(f), 4 counts F6

Count 1 (F6): 9/23/2019 - 12/03/2019				
Identifier	Initials	Date of Death	Contract Amount	Contract Date
N9			\$582.43	
E20			\$831.71	
L13			\$642.33	
L34			\$831.71	
N5			\$818.71	
N4			\$1,035.21	
Total for 09/23/2019 to 12/03/2019			\$4,742.10	

Count 2 (F6): 03/19/2020 - 04/23/2020				
Identifier	Initials	Date of Death	Contract Amount	Contract Date
E15			\$921.43	
N14			\$844.71	
L10			\$831.71	



L20	\$818.71
N6	\$951.88
<b>Total for 03/19/2020 to 04/23/2020</b>	
	\$4,368.44

<b>Count 3 (F5): 10/02/2020 - 11/13/2020</b>				
Identifier	Initials	Date of Death	Contract Amount	Contract Date
D9			\$1,763.37	
D4			\$1,032.12	
C1			\$1,078.71	
D7			\$1,078.71	
C6			\$1,157.71	
D1			\$1,359.65	
<b>Total for 10/02/2020 to 11/13/2020</b>				
			\$7,470.27	

<b>Count 4 (F6): 01/09/2023 - 06/07/2023</b>				
Identifier	Initials	Date of Death	Contract Amount	Contract Date
B3			\$1,597.68	
B13			\$1,339.69	
A1			\$1,313.69	
<b>Total for 01/09/2023 to 06/07/2023</b>				
			\$4,251.06	

<b>Count 5 (F6): 08/08/2023 - 08/22/2023</b>				
Identifier	Initials	Date of Death	Contract Amount	Contract Date
A12			\$1,339.69	
A5			\$1,352.69	
<b>Total for 08/08/2023 to 08/22/2023</b>				
			\$2,692.38	

7. I submit the following facts demonstrate probable cause to believe that between November 26, 2021 and May 10, 2023, in the county of El Paso, in the State and District of Colorado, the defendant, Carie Hallford, did commit the following offense:

§ 18-5-309(1)(a)(II)(A)(Money Laundering, F3) 4 counts

	Date of offense	Description of Offense	Funding/Money movement
Count 1	11/26/2021	Purchase of GMC Yukon for \$92,955	Wire from ENT
Count 2	6/12/2022	Sale of GMC Yukon to Carmax for \$79,000	Check deposited to ENT
Count 3	6/15/2022	Purchase of 2016 Infiniti for \$28,336	Wire from ENT
Count 4	5/10/2023	Sale of 2016 Infiniti to Carmax for \$14,600	Check deposited to ENT

8. Collectively, these offenses are referred to as "The Violations." This Affidavit is being submitted to support the issuance for an arrest warrant for The Violations.
9. The information contained in this Affidavit can be found in CBI Case Report No. 2023-427. In summary, and as set forth below, Jon and Carie Hallford, the principals of Return to Nature Funeral Home, acted with

deceptive business practices. Return to Nature Funeral Home made contractual obligations to properly obtain a death certificate, and subsequently store, cremate, or bury individuals.

10. Many of these contractual obligations went unfulfilled, and their false statements to the State of Colorado resulted in the generation of inaccurate death certificates. In the simplest form, death certificates for at least 190 people are inaccurate, solely based on the fact the bodies were reported to be cremated or buried but were not. Many of the families that paid Return to Nature Funeral Home received an urn with the expectation their loved one's ashes would be inside.
11. Return to Nature reported to the State of Colorado that bodies within their possession were properly disposed of. Instead of cremating or burying bodies as reported, approximately 189 bodies were left to rot at room temperature for an unknown length of time, but at least between September 9, 2023 and October 4, 2023, by Jon and Carie Hallford in a building they owned located at 31 Werner Rd, Penrose, CO.
12. The FBI exhumed a grave in the Pikes Peak National Cemetery and discovered that Return to Nature buried the wrong body in substitution for a US Army Veteran.
13. These deceitful practices resulted in the theft of money from grieving families, insurance companies, the State of Colorado, and others. The illicitly obtained funds were subsequently laundered and used for a variety of things, including but not limited to personal expenditures and the purchase of automobiles.
14. In summary, the information contained in this affidavit in support of the requested arrest warrant is derived from the following:
  - a. Death certificate information obtained from the Colorado Department of Public Health and Environment
  - b. The search of 31 Werner Rd, Penrose, Colorado (building owned by owners of Return to Nature)
  - c. The search of a Digital Video Recorder (DVR) recovered from 31 Werner Rd
  - d. The physical examination and attempted identification of 189 corpses recovered from 31 Werner Rd
  - e. The search of 944 Elkton Rd, Colorado Springs, CO (Place of business for Return to Nature)
  - f. The search of business documents recovered from 944 Elkton Dr
  - g. The review of financial records from ENT Federal Credit Union
  - h. The review of transaction conducted at Home Depot by Jon Hallford
  - i. Historical geolocation data and call detail records from T-Mobile related to two cellular devices associated with Jon and Carie Hallford
  - j. The search of a grave site located in Pikes Peak National Cemetery and recovery of a corpse
  - k. Purchase documents for the purchase of a \$92,955 GMC Yukon
  - l. Purchase documents for the purchase a \$28,336 Infiniti
15. A substantially similar application and affidavit are also submitted to this court in support of the arrest for Jon Hallford.

**Facts in support of probable cause**  
*Definitions relevant to this application<sup>1</sup>*

16. Colorado Code of Mortuary Science, 12-135-105(1)(n) states that "It is unlawful... to engage in willfully dishonest conduct or commit negligence in the practice of embalming, funeral directing, or providing for final disposition that defrauds or causes injury or is likely to defraud or cause injury."

<sup>1</sup> From Colorado Mortuary Science Code, 12-135-103. Definitions.

17. Cremation or cremate means "...the reduction of human remains to essential elements, the processing of the remains, and the placement of the processed remains in a cremated remains container; except that "cremation" or "cremate" does not include natural reduction or to naturally reduce human remains."
18. Embalm or embalming means "...the disinfection and temporary preservation of human remains by chemically treating the body to reduce the presence and growth of organisms, to retard organic decomposition, or to attempt restoration of the physical appearance."
19. Funeral director means "...means a person who, for compensation: arranges, directs, or supervises funerals, memorial services, or graveside services; or prepares human remains for final disposition by means other than embalming."
20. A funeral home, funeral establishment, or mortuary means "...An establishment that holds, cares for, or prepares human remains prior to final disposition, including a crematory or embalming room; an establishment that holds itself out to the general public as providing funeral goods and services; facilities used to hold, care for, or prepare human remains prior to final disposition; an establishment that provides funeral or memorial services to the public for compensation."

*Elements of the violations and relevant legal definitions*

21. § 18-13-101(1)(b) (Abuse of a corpse, treatment): A person commits abuse of a corpse if, without statutory or court-ordered authority, the person ... treats the body or remains of any person in a way that would outrage normal family sensibilities.
22. Facts in this affidavit will support that Jon and Carie Hallford abused the corpses of at least 190 people at least between September 9, 2023 and October 4, 2023. The conditions at 31 Werner Rd, Penrose, CO combined with the presence of Jon and Carie Hallford's cell phones at the location and video surveillance will be discussed below.
23. § 18-4-401(1)(b) (Theft): A person commits theft when he or she knowingly obtains, retains, or exercises control over anything of value of another without authorization or by threat or deception; receives, loans money by pawn or pledge on, or disposes of anything of value or belonging to another that he or she knows or believes to have been stolen, and... knowingly uses, conceals, or abandons the thing of value in such manner as to deprive the other person permanently of its use or benefit;
24. Facts in this affidavit will support that Jon and Carie Hallford made contractual agreements to cremate or bury specific individuals and return the cremains of those individuals to the next of kin, in exchange for money. However, Jon and Carie Hallford never provided the actual remains because the individuals related to the Theft counts were never cremated or buried.
25. § 18-5-309(1)(a)(II)(A)(Money Laundering): A person commits money laundering if he or she...intentionally conducts a financial transaction involving property that is represented to be the proceeds of a criminal offense, or involving property that the person knows or believes to have been used to conduct or facilitate a criminal offense, to ... conceal or disguise the nature, location, source, ownership, or control of property that the person believes to be the proceeds of a criminal offense.
26. Facts in this affidavit will support that Jon and Carie Hallford used the unlawfully obtained proceeds from their scheme to purchase a \$92,955 GMC Yukon, sell the Yukon, purchase a \$28,336 Infiniti, and sell the Infiniti.
27. § 18-5-102(1)(e) (Forgery): A person commits forgery, if, with intent to defraud, such person falsely makes, completes, alters, or utters a written instrument which is or purports to be, or which is calculated to become or to represent if completed ... A written

instrument officially issued or created by a public office, public servant, or government agency.

28. Facts in this affidavit will support that Jon and Carie Hallford caused false death certificates to be generated by the State of Colorado. The statute of forgery has a three-year statute of limitations, and not all of the death certificates that were generated will be charged in this application and Affidavit.

*Background of those mentioned in this affidavit*

29. **Jon Michael Hallford**, DOB: [REDACTED]. I reviewed Hallford's criminal history and located no previous felony convictions. Jon Hallford was previously arrested for a felony menacing case in Oklahoma, but the charges appear to be dismissed. Hallford has a pending civil case in El Paso County (2023CV30591) involving a money dispute between Wilbert Funeral Service and Hallfordhomes, LLC. Jon Hallford has had other civil claims in the past related to his business in El Paso County case 2017C36415 and Prowers County case 2016C30011. Colorado Department of Labor records indicate that Jon may have been employed by Shrine of Rest Funeral Home as recent as Quarter 2 of 2017. I am not aware of any legitimate sources of income other than the self-employment.
30. Based on the investigation to date, investigators believe that Jon Hallford was a funeral director, had a personal identification number (PIN) to input death certificate information, directly communicated with customers, picked up deceased bodies from customer's residences and other various locations, and transported bodies to 31 Werner Rd, Penrose, CO. Jon Hallford purchased a vehicle with unlawfully obtained funds.
31. **Carie Lee Hallford**, DOB: [REDACTED]. Carie Hallford does not have a prior felony conviction. Colorado Department of Labor records indicate that Carie may have been employed by Quest Diagnostics as recent as Quarter 3 of 2022. I am unaware if Carie has any additional legitimate employment other than income from Return to Nature Funeral Home.
32. Based on the investigation to date, investigators believe that Carie Hallford was a funeral director, had a personal identification number (PIN) to input death certificate information, handled the accounting and business records for Return to Nature, and transported bodies with Jon Hallford to 31 Werner Rd, Penrose, CO. Carie Hallford also purchased a vehicle with unlawfully obtained funds.
33. The Hallford family (either Carie or Jon Hallford) have multiple businesses registered with the Colorado Secretary of State. These include but are not limited to Mountain Mortuaries LLC, Hallfordhomes LLC (which operates under trade names of Return to Nature - Burial and Cremation, Return to Nature Crematory, Return to Nature Funeral Home, Return to Nature Funeral Service), and The Pine Box Company, LLC.
34. Return to Nature Funeral Home is a funeral home started in June of 2017 and owned by Jon and Carie Hallford. The Operating Agreement for Hallfordhomes LLC, trade name Return to Nature Burial & Cremation lists Jon Hallford as the CEO, Carie Hallford as the CFO, and John B. Dhooghe as an investment member. The ownership agreement lists Jon Hallford with 45% of the company, Carie Hallford with 45% of the company, and John Dhooghe with 10% of the company.
35. The Return to Nature Funeral Home currently has two different business store fronts including 31 Werner Rd, Penrose, CO and 944 Elkton Dr, Colorado Springs, CO. Investigators believe there were several people employed by Return to Nature Funeral Home between 2017 and 2023. The extent of the employee's exact involvement or culpability is still unknown; however, it appears Carie Hallford had an active role in the financial management of the business and in customer interaction.

36. On or about March of 2019, investigators believed Jon and Carie Hallford opened 31 Werner Rd, Penrose, CO based on an Instagram post made by the user name "Returntonaturecolorado".
37. Based on title paperwork located from Empire Title of Canon City, Carie and Jon Hallford purchased 31 Werner Rd, Penrose, CO on or about November 1, 2021. The 31 Werner Rd, Penrose, CO building was not customer friendly and was advertised as a mortuary.
38. The funeral home advertises cremation and burial and had another business front at 944 Elkton Drive, Colorado Springs, CO. The business had previous other addresses, including 815 E Platte Ave, Colorado Springs, Colorado. According to civil court records, Hallford likely owes tens of thousands of dollars in rent payments and was evicted from the property at 815 E Platte Ave.
39. The funeral home has a website, Instagram page, reviews on Google, and other online advertising presence. This affidavit will incorporate some information from their website.
40. Their website advertises that ... "Our Mission has ALWAYS been Green Burial..". A green burial is defined within the "FAQs" on the website as "a return to the traditional way of burial. No chemicals, metal or unnatural materials. Just you and the Earth, returning to nature. Interment of the bodies is done in a biodegradable casket, basket, shroud, or even nothing at all. No embalming fluid, no concrete vaults. As natural as possible."
41. In essence, Return to Nature Funeral Home offered services to the public to bury or cremate a human in exchange for a fee. As will be discussed below, the Return to Nature Funeral Home did not bury or cremate hundreds of humans remains as expected by their customers. Furthermore, Jon and Carie Hallford received over \$150,000 for these services that were falsely promised.
42. The facts of the investigation suggest that Return to Nature Funeral Homes may have returned a mix of Quikrete or other concrete substance to families that were expected to receive a loved one's remains after an alleged cremation.

*Colorado Funeral Homes Regulations*

43. I have researched some of the requirements for a funeral home to operate in the State of Colorado. I am not an expert on the procedures of registering a funeral home, and I have no personal or profession experience in the business of funeral homes. My basis of knowledge comes from open-source research within the Colorado Department of Regulatory Agencies (DORA) and other research available to the public.
44. An individual can apply for a funeral home license by submitting an application and a fee to the State of Colorado. Part of the regulations require licensed funeral homes to cooperate with investigations and inspections initiated by the Director of Professions and Occupations in DORA.
45. To my knowledge, DORA did not conduct an inspection of the Return to Nature Funeral Home during their period of operation. I am aware that in 2020 the Fremont County Coroner made DORA aware of suspicions about the poor treatment of human bodies and improper refrigeration at 31 Werner Rd, Penrose, Colorado. The Fremont County Coroner stated he never received a reply from DORA.
46. A search of the DORA licensing database revealed that Return to Nature Funeral Home originally was issued a funeral home license on 8/8/2017 (license number \_\_\_\_\_). According to the DORA records, Jon Hallford has been the registered designee since February 16, 2021.

47. According to Colorado law, a funeral establishment shall embalm, refrigerate, cremate, bury, or entomb human remains within twenty-four hours after taking custody of the remains. (Colorado Revised Statutes § 12-135-106). Additionally, if the body will be transported out of state by common carrier it must be either embalmed or shipped in a hermetically sealed container. (Colorado Revised Statutes § 12-135-105).

*Review of information provided by the Colorado Department of Public Health and Environment*

48. A Colorado Death Certificate contains a significant amount of information about a deceased individual. This information includes, but is not limited to, their names, dates of birth, social security number, date and time of death, age at death, county of death, manner of death, funeral home name, place of disposition, method of disposition, and whether or not an autopsy was completed.
49. A list of death certificates that were issued listing "Return to Nature Funeral Home" from the Colorado Department of Public Health was obtained during this investigation. Between the dates of November 2017 and August 2023, there were approximately 1,178 death certificates issued. There were also death certificates issued by Return to Nature Burial and Cremation, Return to Nature Funeral Home Penrose, and Return to Nature Funeral Service.
50. The certifier county of 1,022 of the death certificates issued by Return to Nature Funeral Home was El Paso County. The place of death county of 1,042 individuals was El Paso County.
51. The method of disposal of a body is also listed on a Colorado death certificate. A review of the death certificates issued by Return to Nature Funeral Home concluded the following information.

Method of Disposition	Number of related death certificates
Burial	88
Cremation	1,085
Donation	2
Removal from State	3
Total	1,178

52. The number of cremations was further broken down by which crematory did the cremations for Return to Nature. That data revealed the following:

Crematory	Number of cremations
Roselawn Crematory	510
Wilbert Crematory	396
Affordable Crematory	168
Romero Crematory	11
Total	1,085

53. Based on the foregoing, I submit that the primary method of disposition for Return to Nature Funeral Home was listed as cremation. To my knowledge, Jon Hallford or Carie Hallford did not own a crematory, and acted as an intermediary or reseller of cremations services. To be clear, it appeared Return to Nature did arrange for cremation of some deceased bodies. I submit that because Return to Nature did conduct some of their

business appropriately, it supports that Jon and Carie Hallford knew how a funeral home business was supposed to run.

54. Return to Nature Funeral Homes did not cremate, arrange to cremate, properly store, or submit accurate information for the death certificate of hundreds of purported individuals. Furthermore, I cannot tell this court that the records of who was cremated at which crematory are accurate.
55. Return to Nature caused false death certificates to be issued and reported that people were cremated when they were not. However, I have also obtained independent records from two different crematories that indicate on multiple occasions a specific person was cremated. Investigators are in possession of each of those specific bodies. I have no reason to doubt the records from the crematory that a cremation did occur, and I submit that in at least four occasions the wrong bodies were likely cremated.

*The process of generating a death certificate in the State of Colorado*

56. Investigators obtained additional information from the Colorado Department of Public Health and Environment (CDPHE) related to the process of generating a death certificate. This process is significant, because it supports the elements of the counts for Forgery in violation of C.R.S. 18-5-102(1)(d).
57. The State of Colorado uses the Electronic Death Registry (hereinafter "EDR"). The EDR is "...a secure, Internet site that allows for funeral establishments, physicians and coroner offices to complete, sign and register death records. The system is paperless so there are no forms to complete, fax or email. The system may be accessed from any device, at any location, that has Internet access. The system is also relating information to the Social Security Administration and with Centers for Disease Control and Prevention Software. This allows real time verification of the decedent's social security number as well as a real time review of cause of death data<sup>2</sup>."
58. A funeral home, a coroner's office, or a physician's office can all have a role within the Death Certificate process. Medical certifications must be made on the death certificate.
59. The funeral home is responsible for completing several fields of information on the Colorado Death Certificate including the name, date of birth, date of death, and social security number. The funeral home is also responsible for entering the method of disposition and place of disposition. As discussed above, Return to Nature Funeral Home reported the majority of their decedents as cremated. The funeral home is also responsible for correcting any errors made on their behalf.
60. Funeral Establishments complete a training program on how the EDR website is used. On May 1, 2019, Carie Hallford completed the Colorado EDR for Funeral Establishment online training with a 100% score.
61. The Colorado Death Certificate is a written instrument<sup>3</sup> "filed or required by law to be filed or legally fileable in or with a public office." A person "falsely completes" an instrument when he or she adds or inserts materially false information or a materially false statement into any instrument, genuine or non-genuine, thereby purporting to complete the instrument so as to render it legally operative.<sup>4</sup>

<sup>2</sup> <https://coloradocoronersassociation.colorado.gov/useful-information/electronic-death-registration-edr>

<sup>3</sup> C.R.S. 18-5-101(9) - "Written instrument" means any paper, document, or other instrument containing written or printed matter or the equivalent thereof, used for purposes of reciting, embodying, conveying, or recording information, and any money, credit card, token, stamp, seal, badge, or trademark or any evidence or symbol of value, right, privilege, or identification, which is capable of being used to the advantage or disadvantage of some person.

<sup>4</sup> *People v. Kovacs*, 2012 COA 111, 284 P.3d 186

62. As will be discussed below, Carie and Jon Hallford caused a forged Colorado Death Certificate for the 61 bodies recovered from 31 Werner Rd, Penrose, Colorado that had a death certificate issued within three years of this affidavit.

*Summary of investigation*

63. On Monday, October 2, 2023, Fremont County Sheriff's Office (FCSO) Detective Sergeant Michael Jolliffe was approached by \_\_\_\_\_ informed Detective Sergeant Jolliffe that on October 1, 2023, she went to a former funeral home located at 31 Werner Rd, Penrose, CO. \_\_\_\_\_ friend told her of a horrible smell coming from the building on the property. \_\_\_\_\_ informed Detective Sergeant Jolliffe that she had worked in a hospice and a funeral home. According to \_\_\_\_\_ she could smell what she recognized as human decomposition coming from the building.
64. On Tuesday, October 3, 2023, Detectives and Fremont Chief Deputy Coroner Laura Allen went to 31 Werner Rd and also noticed an overwhelming odor of decomposition coming from the building. The windows of the building were covered in a manner that concealed the interior. The FCSO had prior complaints regarding odors coming from the building, but these were not investigated because the building was a funeral home.
65. A sign on the front door stated: "Return to Nature Funeral Home". The sign further indicated a funeral director was available 24 hours a day and a phone number listed as 719-372-1777. Detective Sergeant Jolliffe attempted to call the number, but it was disconnected.
66. The sign stated that the funeral home's business hours were 9am - 4pm Monday through Friday and Saturday and Sunday by appointment. To the left of the front door was a sign that stated "Due to COVID -19 CLOSED to the PUBLIC This is our Mortuary only All Funeral home operation out of our Colorado Springs location Contact Us 24/7 719-475-0583."
67. A dark stain was protruding from the bottom of the front door. The stain went along the bottom of the door frame and onto the concrete slab. In some areas, the stain had started to travel up the exterior stucco. Detective Sergeant Jolliffe and Chief Deputy Coroner Allen both agreed that the stain was consistent with fluids they had previously observed during prior investigations involving decomposing human bodies.
68. Detective Sergeant Jolliffe reported that on the back side of the building was a small window-mounted air conditioner that was working.
69. Detective Sergeant Jolliffe reported two vehicles on the property. The registration on the vehicles were expired and were registered to either Jon Hallford or Return to Nature Funeral Home.

*Initial Coordination with Colorado Department of Regulatory Agencies*

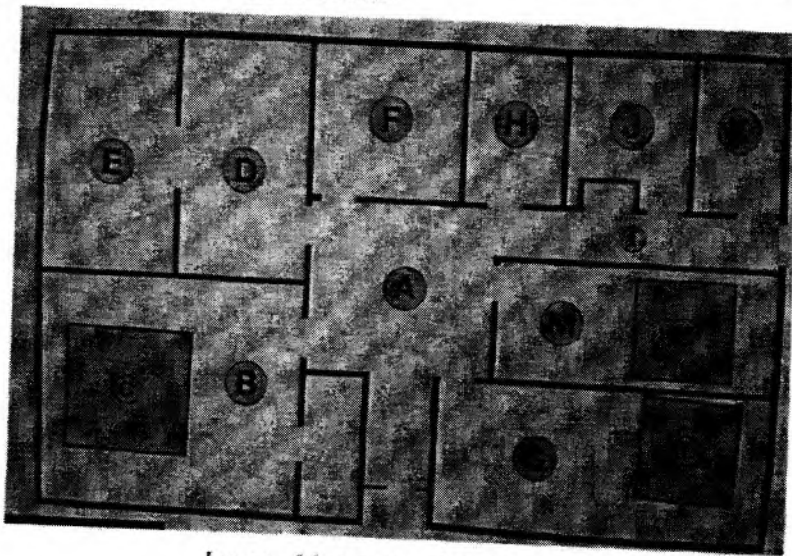
70. Fremont Deputy Coroner Allen contacted the Colorado Department of Regulatory Agencies (DORA) and explained the observations made at 31 Werner Rd, Penrose, CO.
71. Deputy Coroner Allen was told by a representative from DORA that the owner (Jon Hallford) of the Return to Nature Funeral home agreed to meet an inspector at 31 Werner Rd to allow the inspectors access to the inside of the building for inspection. The owner told DORA he was using the building in Penrose to learn how to do taxidermy and that he knew he had a problem there. An appointment between DORA and the owner was set for 2:00 p.m on October 4, 2022. However, Hallford failed to show up for the appointment.
72. DORA Inspector Joseph Berry conducted an exterior inspection and was able to see the inside of the building via a small opening in a window covering. Upon looking into the



building, several white plastic bags were lying on the floor. Deputy Coroner Allen stated the bags were consistent with body bags she had used in her career.

*The execution of a search warrant at 31 Werner Rd, Penrose, CO beginning on October 5, 2023*

73. Detective Sergeant Jolliffe applied for and was granted two state of Colorado search warrants for 31 Werner Rd, Penrose CO. The search warrants were authorized by the Honorable Magistrate Colette LeBeau. In summary, the initial warrant was executed, and investigators determined additional hazardous material teams were needed to continue the search. The second warrant authorized the continued search of the property.
74. 31 Werner Rd, Penrose, Colorado is a single-story office building with approximately 2,500 sq ft of interior space divided into multiple interior rooms.
75. During the search warrant, investigators drew a diagram of the building and labeled rooms by a unique letter. At some points in the Affidavit, I will refer to specific room letters. Bodies were recovered in every room of the building, including the bathroom with the exception of the utility room (Room K). An image of the layout of the building is provided below for the court's reference.



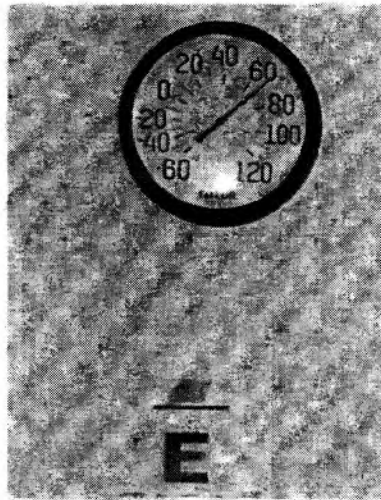
*Layout of the interior of 31 Werner Rd*

76. During the execution of the search warrant on October 5, 2023, approximately 115 body bags were originally observed in different stages of decomposition. Some bodies were contained in what appeared to be disposable body bags, some were in body bags used by local coroners, and some of the body bags were wrapped in sheets and then in duct tape. Some bodies were exposed with no covering at all, or just partially covered. Some bodies were on gurneys, and some were just laying on the floor or stacked on top of other bodies.
77. Investigators also located personal artifacts, presumably given to Return to Nature by family members with the intention of the artifacts being buried or placed with the remains.
78. The decomposition of a human body can produce various fluids. These fluids covered the floors within the building. Maggots, flies, and other insects in various stages of life were vastly present in the building. In some areas, these insects covered the floor and were on many of the bodies.

79. In many of the clear plastic bags, decomposition fluid had filled the bags and/or caused the bags to break subsequently spilling human decomposition on the floor. Five gallon red and orange plastic buckets from Harbor Freight and Home Depot were in the building. In some instances, the buckets were placed below the bodies to collect the leaking decomposition fluid. The condition of the floors presented a slip hazard for the team that ultimately removed the bodies.

*Small part of Room B and the use of a Home Depot Bucket to collect decomposition fluids*

80. Several areas of the building were initially inaccessible due to bodies being stacked too high. The building did have three (labeled C,N,L) refrigerators; although none of them appeared to be working properly. In room G (refrigerator L), the door was completely open and bodies were stacked in front of it. In room B (refrigerator C) was powered by an exterior window type air conditioning unit that was running, but the door was also open. The refrigerator appeared to be homemade. The overall temperature of the interior space was approximately 70 degrees, according to a thermostat on one of the walls.



*Thermostat on the wall of room E showing approximately 70 degrees*

81. During the warrant execution, investigators located evidence of the presence of chemicals, Raid brand bug bombs, large Arm and Hammer brand baking soda containers, and Febreze containers.
82. A large bone grinder was present in "Room A". Next to the bone grinder was a black and grey bag of Quikrete concrete mix/resurfacer. An empty bag of Quikrete was also located in a container with other trash. I submit that the concrete mix, and possibly some other substance, was used to fill urns and subsequently given to the deceased individual's family.
83. It appeared that in one of the rooms, Return to Nature was experimenting with water cremation. Water cremation, also known as alkaline hydrolysis, is a process to dispose of human remains in which pressure, heat, water, and potassium hydroxide is used to dissolve a body in approximately four to six hours. The process produces a fatty "waste" product, and the remaining bones.

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*Overview of Room A with decomposition fluid, bone grinder, multiple bodies, and QuikCrete bag*

*Approximately 40 Bodies stacked on top of each other and in plastic totes within room L*

*Room C. exposed corpse head stacked with other bodies within an inoperative refrigerator with insects on table*

*Photos of room M with decomposition and corpse not in body bag*

*Photo of bodies within refrigerator N with zoom to 75 degree temperature*

84. Members from the FBI, Air Force National Guard, El Paso County Coroner, El Paso County Hazmat, Fremont County Sheriff's Office, CBI, and other agencies contributed to the proper and safe removal of approximately 184 body bags from the building. These personnel experienced physical and emotional duress during the process of removing the bodies. While wearing special protective suits, multiple layers of gloves, respirators, eye protection, and protective boots, they trudged through the layers of human decomposition on the floor, loaded decomposing corpses onto refrigerated trucks, and endured working in unimaginable conditions.
85. At the time of this affidavit, investigators believe approximately 189 bodies were recovered from 31 Werner Rd. The court should take notice that both infant/fetus and adult bodies were located. The process to identify the bodies will be discussed below in more detail, but investigators found multiple remains in many of the same bags, making the above mentioned count of 184 bags a misleading representation of the total bodies within the building.

*Room G with multiple bodies stacked on top of one another with decomposition*

86. The elements of Colorado C.R.S §18-13-101 include that an individual "...treated the body or remains of any person in a way that would outrage normal family sensibilities".



*The process to identify the remains within 31 Werner Rd, Penrose, CO*

87. The bodies recovered from 31 Werner Rd, Penrose, CO, were methodically and individually numbered based on the place of recovery within the building, placed in new body bags, and transported to the El Paso County Coroner's Office where they were properly maintained in refrigerated units. Photographs were taken of each body bag at the scene, before transport, and at the El Paso County Coroner's Office.
88. A process was developed to attempt to identify individuals from a mixture of fingerprints compared to Colorado Department of Motor Vehicle records (when a fingerprint was available), a physical examination of remains (some individuals had hospital bracelets still on), X-Ray, medical record review, and other identifying features like serial numbers from medical implants. Dental examination also took place but did not yield results in a timely manner when compared to fingerprinting.
89. As of the date of this affidavit, approximately 141 of the remains had been tentatively identified. At the time of this affidavit, the earliest date of death for a body recovered was in \_\_\_\_\_ of 2019. I have included a chart below that lists the number of identified bodies recovered, grouped by the year of death for each body.

Date (Year) of Death	Number of Bodies
2019	23
2020	61
2022	17
2023	40

*Comparison of those identified with death certificate information*

90. I compared some, but not all, of the initially identified bodies with the corresponding death certificate information. I submit to the court that because the remains are present within the El Paso County Coroner's Office, it would be impossible for the records of cremation or burial to be accurate.
91. Although I will only reference six bodies in this section of the affidavit, I have no reason to believe that any of the other bodies recovered would yield a different result. I submit that these below individuals are a fair and accurate sample as it relates to the entirety.
92. For example, body A1 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Wilbert Crematory.
93. Body A2 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Wilbert Crematory.
94. Body E20 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Roselawn Crematory.
95. Body C4 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Roselawn Crematory.
96. Body E22 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Roselawn Crematory.

97. Body L41 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Roselawn Crematory.
98. Body A6 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The death certificate listed \_\_\_\_\_ method of disposal as cremation, and place of disposal as Wilbert Crematory.
99. The State of Colorado has only a few ways a human body can be legally disposed of: cremation, removal from the state, or burial. The presence of the 189 bodies within 31 Werner Rd, Penrose, Colorado and one body from Pikes Peak National Cemetery is evidence in and of itself that the death certificates are collectively false. As discussed above, Return to Nature caused the false death certificate to be produced by submitting the information to the State of Colorado.

*The recovery of a Digital Video Recorder at 31 Werner Rd*

100. A Zosi H264 DVR, model ZRO4JB/10, Serial Number \_\_\_\_\_ surveillance camera system was seized by the FCSO during the search warrant execution at 31 Werner Rd, Penrose CO. At least four video surveillance cameras were located while reviewing photos taken during the search warrant execution. One of the cameras was located in the interior within room A, one was located on the exterior above the front door, and two were covering the rear/side areas of the building. I have included a photo of room A picturing the camera above the door to illustrate the viewpoint the camera may have captured.

*Room A with a surveillance camera in the top corner above the door*

*A review of the DVR seized from 31 Werner Rd, Penrose, CO*

101. A search warrant was authorized in the 4<sup>th</sup> Judicial District on October 17, 2023 for the Zosi DVR recorded seized from 31 Werner Rd, Penrose, Colorado. Investigators were able to extract data from the device. The data was voluminous, and not all of the footage on the DVR was made available at the time of this Affidavit. Interior and exterior footage exists from approximately August 22, 2023 to October 4, 2023.
102. During the early morning hours of September 9, 2023, a silver VW minivan was captured on the exterior surveillance cameras. Investigators believe that Carie Hallford stayed outside the building and acted as a "look out" while Jon was inside the building. As will be discussed below in more detail, the cell phone associated with Carie Hallford had location data at or near 31 Werner Rd during this same time.
103. The exterior camera at the side entrance of 31 Werner Rd captured an individual with matching physical identifiers to Jon Hallford, including two large tattoos on both forearms. Hallford unscrewed the lightbulb, and continuously scanned the area while he entered the building with what appeared to be two deceased humans on a cart.
104. Prior to bringing the bodies inside the building, Hallford obtained the cart from inside the building. Some of his activity inside the building was captured on camera.

105. The interior camera, which captured some of the room investigators labeled as "A", shows multiple deceased human bodies in the room, including a body on a gurney that was not covered, and still had hospital socks and a diaper on. The body had already begun to decompose.
106. Based on the combined interior and exterior footage on September 9, 2023, Hallford needed that gurney to bring bodies into the building from the VW van. Hallford flipped the deceased body off the gurney onto the floor using a sheet that was beneath the body. After the body had been dumped on the floor, Hallford appeared to wipe the remaining decomposition from the gurney onto other bodies in the room.
107. The interior camera also captured Hallford bringing several white bags containing deceased bodies in the room. When combined with the exterior camera view, the bodies likely came from the VW van and were transported on the gurney Hallford took from room "A".

*Interior surveillance footage of Room A on or about September 9, 2023*

*Exterior footage on September 9, 2023 – female to left of fence (circled), male to right of fence*

*Additional photo of the female, suspected to be Carie Halford based on cell phone location data*

*Review of Return to Nature's Website at <https://www.returntonaturecolorado.com>*

108. On Monday, October 9, 2023, I visited the Return to Nature website, <https://www.returntonaturecolorado.com/>. The website has since been taken down and is no longer available to view.



**GREEN BURIAL COLORADO - The Pine Box Company**

Available 24 Hours a Day 719-475-0583

AS OF JULY 2023, RETURN TO NATURE NO LONGER OFFERS CREMATION SERVICES.

WE WILL HONOR existing pre-arrangements for Direct Cremation ONLY.

Our Mission has ALWAYS been **Green Burial**...

*Image of the homepage of <https://www.returntonaturecolorado.com>*

109. The following five paragraphs in this section all relate to my review of their website :

110. The website states, "AS OF July 2023, Return to Nature NO LONGER offers Cremation Services." "We WILL HONOR existing pre-arrangements for Direct Cremation ONLY".

111. On the home page is a link titled "Natural/Green Burial". The website defines Green Burial as ... "Green Burial is a natural way of caring for your loved one with minimal environmental impact. Green Burial aids in the conservation of natural resources, reduction of carbon emissions, and the preservation of habitat, WITHOUT the use of Harsh embalming chemicals, metallic, plastic or unnatural items.

112. You can still view your loved one who is NOT embalmed. Embalming is NOT law. IN the state of Colorado within 24 hours the body must either be embalmed or placed in a regulated temperature-controlled environment, meaning under refrigeration, dry ice, etc..."

113. Below the description of a Green Burial is another link that opens an PDF document named "RTN-COS-GPL-2022-FALL-1.pdf". This document contains a general price list (with a description of those services), effective October 1, 2022. I have included relevant prices or descriptions of services listed on this document.

DESCRIPTION OF SERVICE	COST OF SERVICE
<b>Natural Burial-including graveside ceremony</b>	\$1,895
"Includes the services of Return to Nature staff, transfer from the place of death into our care within 45 miles of Colorado Springs, refrigeration, Document Processor obtaining the appropriate permits for transportation, final disposition and obtaining Death Certificates, planning / scheduling a graveside service with a cemetery / burial location within the state of Colorado, transfer to the cemetery within El Paso County, and basic graveside ceremony."	
<b>Direct Cremation</b>	\$1,290

Return to Nature Basic Services of Funeral Home & Staff, Transfer from the place of death into our care (within 45 miles of Funeral Home), Refrigeration (6 days) - required within 24 hours of death in Colorado, Death Certificate / Cremation Permit Processor Fee, Recycled / Biodegradable Paperwork, One Standard size Basic Biodegradable Cremation / Burial Urn, Crematory Fee, A Tree planted in a Colorado National Forest in Honor of your loved one	
Chemical Embalming	N/A
Formal Visitation	\$480
Final Moment	\$285
RTN Chapel Memorial Service	\$380
Basic Services of the Funeral Director and Staff	\$495
Standard Crematory Fee	\$290
Graveside Service	\$525
Immediate Burial	\$1,370
Rental Casket	\$285
Slumber Bed-No Charge	No Charge
Foyer Service Fee/Reception Set-up & Planning Fee	\$285
Return to Nature Alternative Location	\$380
Dressing/Cosmetics/Casketing	\$125
Media Download-Memorial Video & Service music, etc	\$9
Pacemaker Removal & Disposal -Device Donation Fee	\$10
Autopsy Restoration-minimal of 2.5 hours	\$385
Trauma Restoration-minimal of 3.5 hours	\$465
Trauma Pouch	\$45
Transfer of body into our care (within 45 miles of the funeral home)	\$280
Outside of 45 miles \$2.85 per loaded mile	
Dropping of Cremains at a Colorado National Cemetery	\$180
Refrigeration, per 6 days	\$105
Colorado Certified Death Certifications	\$20 for first, \$13 for each additional

114. Under the "Contact Us" tab on the website, the phone number of 719-475-0583 is listed, along with the below photograph.



*Photograph from website*

*CO Drivers License photo of Hallford*

*The execution of a search warrant at 944 Elkton Dr, Colorado Springs, Colorado on October 5, 2023*

115. Investigators located an additional business location for Return to Nature Funeral Home at 944 Elkton Drive, Colorado Springs, Colorado.
116. FCSO Detective Sergeant Jolliffe applied for and was granted a state of Colorado search warrant in Fremont County for 944 Elkton Dr, Colorado Springs, CO. District Court Magistrate LaBeau authorized the search warrant. The search warrant was executed on October 5, 2023 and investigators lawfully seized several items which will be discussed below.
117. Fremont County Detectives also spoke with the landlord of the property at 944 Elkton Drive, Colorado Springs, Colorado. The landlord told investigators that in late August 2023, another tenant in the building complained that he/she smelled dead bodies coming from 944 Elkton Drive.
118. The landlord approached Hallford during the daytime hours on or about September 8, 2023 and confronted him about the smell that other tenants complained about. Hallford told the landlord that the smell was coming from a laser wood engraving machine and that he would get rid of the machine that day.
119. I submit that the timing of the complaint of dead bodies at 944 Elkton Dr, Colorado Springs, CO on September 8, 2023 prompted the transport of bodies to 31 Werner Rd, Penrose, Colorado during the early morning hours of September 9, 2023. Video surveillance supporting this claim is discussed above.
120. During the warrant execution, a self-constructed cooling unit was located within 944 Elkton Drive. I was told by investigators that were present for the warrant execution that the cooling unit smelled like human decomposition. Hallford was likely storing deceased human bodies within the unit.
121. 19 boxes of records were lawfully seized during this search warrant execution, and several digital devices were collected. At the time of this Affidavit, not all of the information seized has been examined.

*Review of business documents seized from 944 Elkton Dr*

122. As mentioned above, 19 boxes of records were seized from 944 Elkton Dr, Colorado Springs, CO (Return to Nature's place of business). These records contain business records from Return to Nature, including but not limited to accounting records, contracts



for goods and services, receipt of payment, release of documentation/items, copies of death certificates, death certificate order forms, an authority for final disposition.

123. For example, for victim identified as A2, a contract was signed on for the following services: basic services of a funeral director, transfer of deceased to funeral home, document processor, crematory fee, refrigeration, required cremation container, urn, sales tax, death certificates, additional death certificate fee (x4). Total cost was \$1,365.69. The funeral director was listed as "C Hallford".
124. According to the Colorado Death certificate, A2 was cremated at Wilbert Crematory. A2 was located in room A of 31 Werner Rd, Penrose, Colorado approximately 320 days later. I have reviewed photos of the recovery of A2's body from within 31 Werner Rd, Penrose, CO, and A2 was treated in such a manner that violates CRS § 18-13-101 (abuse of a corpse).
125. Investigators also located several print outs of what I recognize to be spreadsheets likely created in Microsoft Excel. The spreadsheets provide a detailed accounting of the dates of contract, name, total payment, the costs associated with each customer, and the net profit of each customer for each month of 2019, 2020, and 2021. Investigators were unable to locate similar spreadsheets for 2022 and 2023 although binders for these years do exist.
126. For the month of January 2020, it appears Return to Nature had a Monthly "Net Profit" Total of \$31,453.20. Although Return to Nature uses the term "Net Profit", review of the spreadsheets shows that what Return to Nature titled "Net Profit" is actually "variable sales gross". The actual net profit of the business would include other items such as semi-fixed and fixed overhead costs, and other variable selling costs like payroll. I have included a photograph of one of those spreadsheets below. I electronically added the black covering over the "NAME" column to protect the identities of those listed on the spreadsheet.

*Spreadsheet located at 944 Elkton Dr, Colorado Springs, CO*

127. A new spreadsheet was created from the spreadsheets detailing the variable sales gross of the business by month and the number of clients Return to Nature had each month. Between 2019, 2020, and 2021, Return to Nature made \$765,139 in variable sales gross and serviced 887 clients.

<b>Variable Sales Gross (\$) and # of bodies accepted each month</b>						
	<b>2019</b>	<b>#</b>	<b>2020</b>	<b>#</b>	<b>2021</b>	<b>#</b>
<b>January</b>	21,777	17	31,453	39	23,590	27
<b>February</b>	8,223	8	36,106	40	20,155	20
<b>March</b>	10,329	6	19,689	31	13,740	14
<b>April</b>	11,002	11	29,140	35	19,211	19
<b>May</b>	19,536	21	10,058	19	17,047	14
<b>June</b>	18,754	32	15,717	24	11,813	10

July	23,545	35	18,280	27	10,372	13
August	20,642	20	23,550	35	14,887	19
September	25,719	40	29,080	29	20,660	18
October	22,774	34	24,364	28	24,773	19
November	36,327	42	27,200	31	12,293	14
December	37,502	43	40,782	35	15,049	18
<b>Total</b>	<b>256,130</b>	<b>309</b>	<b>305,419</b>	<b>373</b>	<b>203,590</b>	<b>205</b>

<b>Grand Total (\$)</b>	<b>\$ 765,139</b>
<b>Total bodies</b>	<b>887</b>
<b>Average bodies per month</b>	<b>25</b>
<b>Average \$ per month</b>	<b>\$ 21,254</b>

128. I was also able to search the physical records for the invoices and contracts associated with the identified corpses recovered from 31 Werner Rd, Penrose, CO. I located some, but not all of the invoices/contracts and totaled them by year which total to approximately \$146,909.

129. A chart depicting those results is below. These amounts are important, because they are the basis of illicit funds subsequently used in the purchase of automobiles as discussed below, in violation of the Colorado money laundering statute.

<b>Date of Death</b>	<b>Number of Bodies Recovered and ID</b>	<b>Invoices/Contracts Located</b>	<b>Total Received (\$)</b>
2019	20	18	15,075
2020	61	53	57,424
2022	17	16	22,302
2023	38	37	52,108
<b>Total \$</b>			<b>146,909</b>

*Theft in violation of Colorado Revised Statutes*

130. Jon and Carie Hallford accepted payments from a multitude of places including but not limited to customer payments, insurance companies, and the State of Colorado. The Hallford's made an agreement to provide funeral services in exchange for the payment. These services could include refrigeration, cremation, burial, and other fees associated with a funeral.

131. The Hallford's did not fulfill their portion of the agreement for many customers. Based on the facts in this affidavit, at least 190 customers did not get the services the Hallfords received payment for.
132. This affidavit supports five counts of Theft in violation of § 18-4-401(1)(b).
133. The next six paragraphs support Count 1 of the theft charge, totaling \$4,742.10, a Class 6 Felony.
134. Body N9 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$582.43. Records indicate that \_\_\_\_\_ paid \$255.00 of this total amount by check. The remaining balance was paid by unknown person(s).
135. Body E20 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Homes contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_, showed an amount of \$831.71. Records indicated that the Colorado Department of Human Services paid \$798.71, and \_\_\_\_\_
136. Body L13 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contact for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$642.33. Records indicated that the Colorado Department of Human Services paid \$544.33. The remaining balance was paid by unknown person(s).
137. Body L34 was identified as \_\_\_\_\_, who died in \_\_\_\_\_ The return to Nature Funeral Home contact for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$831.71. Records indicated that the Colorado Department of Human Services paid \$498.71. The remaining balance was paid by unknown person(s).
138. Body N4 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contact for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1035.21. Records indicated that the Colorado Department of Human Services paid \$1015.21. The remaining balance was paid by unknown person(s).
139. Body N5 was identified as \_\_\_\_\_, who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$818.71. Records indicated \_\_\_\_\_ he entire amount via an \_\_\_\_\_
140. The next five paragraphs support Count 2 of the theft charge, totaling \$4,368.44, a Class 6 Felony.
141. Body E15 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ note: this was a pre-needs contract) showed an amount of \$921.43. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
142. Body N14 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$844.71. Records indicated the Colorado Department of Human Services paid \$634.12. The remaining balance was paid by unknown person(s).

143. Body L10 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$831.71. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
144. Body L20 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$818.71. Records indicated the Colorado Department of Human Services paid \$818.71.
145. Body N-6 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$951.88. Records indicated the Colorado Department of Human Services paid \$931.88. The remaining balance was paid by unknown person(s).
146. The next six paragraphs support Count 3 of the theft charge, totaling \$7,470.27, a Class 5 Felony.
147. Body D9 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,763.37. Records indicated the 4<sup>th</sup> Judicial District Victim Compensation paid the entire amount.
148. Body D4 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,078.71. Records indicated Fidelity Life Insurance paid the entire amount.
149. Body C1 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$1,078.71. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
150. Body D7 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$1,078.71. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
151. Body C6 was identified as \_\_\_\_\_, who died in \_\_\_\_\_ The Return to Nature Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO dated \_\_\_\_\_ showed an amount of \$1,157.7. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
152. Body D1 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,359.65. Records indicated the Colorado Department of Human Services paid \$1,177.50. The remaining balance was paid by unknown person(s).
153. The next three paragraphs support Count 4 of the theft charge, totaling \$4,251.06, a Class 6 Felony.
154. Body B3 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,597.68. Records indicated Great Western Insurance Company paid \$911.39. The remaining balance was paid by unknown person(s).

155. Body B13 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,339.69. Records indicated \_\_\_\_\_ paid the entire amount via \_\_\_\_\_
156. Body A1 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1313.69. Records indicated \_\_\_\_\_ Falcon Heights Health & Rehab paid the entire amount via \_\_\_\_\_
157. The next two paragraphs support Count 5 of the theft charge, totaling \$2,692, a Class 6 Felony.
158. Body A12 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ (note: this was a pre-needs) showed an amount of \$1,339.69. Records indicated \_\_\_\_\_ paid the entire amount of \_\_\_\_\_
159. Body A5 was identified as \_\_\_\_\_ who died in \_\_\_\_\_ The Return to Nature Funeral Home contract for goods and services recovered from 944 Elkton Dr, Colorado Springs, CO, dated \_\_\_\_\_ showed an amount of \$1,352.69. Records indicated that the Colorado Department of Human Services paid \$1,277.69. The remaining balance was paid by unknown person(s).
- Search of Hallford residence at 7679 Crestone Peak Trail, Colorado Springs, CO*
160. A search warrant was applied for and granted by this court for the residence of Jon and Carie Hallford at 7679 Crestone Peak Trail, Colorado Springs, CO. The warrant was executed on October 17, 2023, but the Hallfords were not located at the residence.
161. Indicia for Jon and Carie Hallford was located, but investigators did not seize any items during the search.
162. A Detective from Fremont County spoke with the landlord that owns 7679 Crestone Peak Trail. The landlord told the Detective that Carie and Jon Hallford moved into the home in August of 2023. The Hallford's paid rent for the months of August and September up front but had not paid the October 2023 rent.
163. Based on other facts, including their historical cellular location data, I submit that Carie and Jon Hallford fled Colorado on or about October 4, 2023 when main stream media began to release facts about the investigation and the discovery of bodies at 31 Werner Rd, Penrose, Colorado.
- Search warrant authorized and served to ENT Federal Credit Union*
164. A search warrant was authorized by this court to ENT Federal Credit Union for banking records from Jon and Carie Hallford and Return to Nature Funeral Home. This warrant was executed on October 18, 2023 and data was received on November 1, 2023. The Hallfords had a savings and checking account (ending in \_\_\_\_\_) in the name of Hallfordhomes LLC DBA Return to Nature. Jon and Carie Hallford were both authorized signers on the account, and records were obtained from January 1, 2019 to September 30, 2023 (57 months of data)
165. There were over 1,500 pages of records returned from ENT. A limited review of those records was conducted to analyze the income and expenses of the business.
166. The \_\_\_\_\_ account appeared to have personal banking activity for the Hallfords. The spending will be detailed further below, but travel expenses, meals, Amazon purchases,

entertainment, clothing, furniture, student tuition, transfers to Carie Hallford's CashApp, and other expenses were located within the account.

167. There were approximately \$1,996,382 in deposits that went into the account during the review period. There were approximately \$1,998,444 in withdrawals that came from the account. The average ending balance at the end of each month was approximately \$6,290. These amounts do not include some extraordinary income discussed below. Generally, Return to Nature depleted all the cash they received in account each month.

Jan 1, 2019 to Sept 30, 2023 Acct		
	Deposit	Withdrawals
Total	1,996,382	1,998,444
Average Monthly	35,024	35,060

168. Return to Nature had ordinary business income in the form of Automatic Clearing House (ACH or electronic transfers), limited cash, and checks from customers. Return to Nature appeared to use electronic payment processors to take credit cards from customers, including but not limited to Square Inc.
169. While calculating the above total deposits and withdrawals, three transactions were removed from the deposits that were not from ordinary business activity. These transactions were deposits from the United States Treasury in the amounts of \$149,900, \$350,000, and \$382,300 on May 19, 2020, May 24, 2021 and November 9, 2021 respectively. \$882,200 (the total of these three transactions) was also removed from the withdrawals. These three deposits are believed to be federal COVID relief funding that the Hallfords must have applied for.
170. The purpose of removing these suspected COVID relief funds was to have accurate averages that reflected the ordinary business activity. The Hallfords spent every dollar of the \$882,200, which is discussed below in more detail.
171. Checks were reviewed that were drawn on the account. Checks were written to Roselawn Crematory, Alternative Cremation, Wilbert Funeral Services, employees, mortuary transport services, funeral supply stores, and Vital Records office. The vast majority of the checks in the ENT records were signed by Carie Hallford.
172. In the months of May, June and July of 2021, there were approximately \$93,000, \$69,000, and \$42,000 taken from the account respectively. This included the following approximate personal expenses: \$5,200 in Amazon expenditures, \$6,800 in travel expenses on Expedia.com, \$3,400 in jewelry from Tiffany and Co, a trip to Las Vegas, NV for \$5,000, a trip to California for \$2,400, \$3,600 in Airline expense, \$1,200 in tanning expense at Tan Your Hide, and \$1,800 at American Furniture Warehouse. Some further personal expenses are detailed below.

Date	Description	Amount \$
7/19/2021	The Club	102
7/19/2021	Fabulous Vegas	5
7/19/2021	Uber	65
7/19/2021	Uber	42
7/20/2021	Bonanno NY Pizza	45
7/20/2021	Bonanno NY Pizza	45





7/23/2021	Mandalay Bay	132
7/23/2021	Starbucks	46
7/23/2021	Antie Annes	6
7/23/2021	3 Citta Dell Luci	122
7/23/2021	TST RI	203
7/23/2021	Sushi Roku	215
7/23/2021	Starlight Tattoo	500
7/23/2021	Uber	5
7/23/2021	Uber	10
7/23/2021	Uber	20
7/23/2021	Uber	46
7/23/2021	Secret Garden	125
7/24/2021	Mandalay Bay	150
7/24/2021	Mandalay Bay	44
7/24/2021	Mandalay Bay	45
7/24/2021	MB Market	7
7/24/2021	Uber	49
7/24/2021	DIA Parking	140
		<b>\$8,759</b>

*\$5,000 in Las Vegas trip and \$3,400 in Tiffany and Co jewelry detailed*

173. In the months of November and December of 2021, there were approximately \$151,000 and \$62,000 taken from the account respectively. This included the following approximate personal expenses: \$19,000 in Amazon expenditures, \$6,800 for a trip to California, \$31,000 in cryptocurrency, \$7,700 in travel expenses on Expedia.com, \$1,600 in purchases Gucci (a luxury brand), \$3,400 in jewelry, \$7,100 in a trip to Florida, \$8,500 in laser body sculpting, and a trip to Las Vegas, NV for \$9,000.
174. For example, during the November 2021 trip to Miami, FL, the Hallfords spent \$837 at Trulucks Seafood restaurant, and \$1,019 at Express clothing. During the February 2022 trip to Las Vegas, NV, the Hallfords spent \$1,514 at the MGM Grand Hotel, \$2,418 at Caesars Hotel, and \$483 at the Caesars Buffet.
- Search warrant authorized and served to Home Depot*
175. A search warrant authorized by this court related to transactional data from Home Depot was executed on October 17, 2023.
176. The information obtained from Home Depot including purchase transactions from approximately March of 2020 to January of 2023. The purchaser listed on the transactions was Jon Hallford. I was able to obtain surveillance footage from one of the transactions, and I recognized the individual conducting the transaction as Jon Hallford, based on his driver's license photo and social media posts.
177. Home Depot transactional data was located within the ENT Federal Credit Union records for the account, which additionally corroborates the Home Depot records. I found Home Depot purchases on 3/10/20, 3/11/20, 5/19/20, 9/5/20, 1/28/23.
178. I located purchase records for approximately 660 pounds of Quikrete Concrete Mix, specifically on the following dates. The sale amount is the total receipt from the whole transaction and would likely include other purchases. On 1/28/2023, Hallford purchased

three bags of 80lb Quikrete concrete mix, as well as other additional items that all totaled \$121.01.

179. The Quikrete concrete is suspected to be used by Hallford to fill urns in substitute for the actual ashes of an individual. As mentioned above, an open bag of Quikrete was found next to a bone grinder at 31 Werner Rd, Penrose, CO.

Date of Sale	Description	Sale Amount
3/11/2020	80LB QUIKRETE CONCRETE MIX	18.42
5/19/2020	60LB QUIKRETE SAND TOPPING MIX	225.91
5/19/2020	60LB QUIKRETE SAND TOPPING MIX	225.91
5/19/2020	60LB QUIKRETE SAND TOPPING MIX	225.91
9/5/2020	50LB QUIKRETE FAST-SET CONCRETE	277.77
9/5/2020	50LB QUIKRETE FAST-SET CONCRETE	277.77
3/10/2020	60LB QUIKRETE CONCRETE MIX	34.96
3/10/2020	80LB QUIKRETE CONCRETE MIX	34.96
1/28/2023	80LB QUIKRETE CONCRETE MIX	121.01
1/28/2023	80LB QUIKRETE CONCRETE MIX	121.01
1/28/2023	80LB QUIKRETE CONCRETE MIX	121.01

180. On May 16, 2020 and June 15, 2020, Hallford purchased a Home Depot 5 gallon bucket. Home Depot buckets were present within 31 Werner Rd, Penrose, CO.
181. I also located purchases on May 27, 2020 and April 20, 2021 for a "CoolBot Generation 6 Walk-in Cooler Control". After reviewing Home Depot's website, I found these devices are likely the same device found within the refrigerator in room N as depicted above.

*Search warrants authorized and served to T-Mobile*

182. Search warrants were granted by this court for the telephone numbers of 719-290-6026, 415-377-7658, both utilized by Jon Hallford, and 719-964-4298, used by Carie Hallford. The subscriber for both the 415-377-7658 and the 719-964-4298 phones was listed as Carie Hallford.
183. The search warrants authorized the historical cell-site locations, call detail records, subscriber information, and information about the devices connected to the accounts.
184. Investigators believe that Jon Hallford utilized the 719-290-6026 phone at some point, but on April 30, 2022, the device identifiers changed for this account. Investigators believe a new user began using the 6026 phone on that date, and Hallford began using the 415-377-7658 phone.
185. A review of the historical cell site location for phone 415-377-7658 revealed the following information specific to Penrose, Colorado. Between the dates of May 17, 2023 and October 3, 2023, the 415-377-7658 phone was connected to the tower that would service 31 Werner Rd, Penrose, Colorado at least 13 times on the following dates displayed in the chart below.
186. A review of the historical cell site location for phone 719-964-4298 revealed the following information specific to Penrose, Colorado. Between the dates of April 5, 2022 and October 3, 2023, the 719-964-4298 phone was connected to the tower that would service 31 Werner Rd, Penrose, Colorado at least 18 times on the following dates displayed in the chart below.

Jon Hallford Tower Hits in Penrose, CO	Carle Hallford Tower Hits in Penrose, CO
5/17/2023	4/5/2022
5/20/2023	3/20/2023
5/22/2023	4/15/2023
5/25/2023	4/16/2023
6/2/2023	4/27/2023
6/5/2023	5/2/2023
6/12/2023	5/21/2023
7/11/2023	5/22/2023
8/10/2023	5/25/2023
8/13/2023	6/5/2023
8/17/2023	6/15/2023
8/25/2023	6/19/2023
10/3/2023	6/21/2023
	7/8/2023
	7/27/2023
	8/10/2023
	9/9/2023
	10/3/2023

187. It appears that both Jon and Carie Hallford's phones traveled to 31 Werner Rd, Penrose, CO on the same dates of 5/22/23, 5/25/23, 6/5/23, and 10/3/2023. Based on the facts they are married, co-owners of the business, and the distance between Colorado Springs and Penrose, it is reasonable to believe they traveled together.
188. Financial transactions from ENT account in Penrose, Colorado were also located. Some of these transactions occurred on the same day Jon or Carrie's cell phone was also located in Penrose. For example, on 4/16/23, a Penrose Alta Convenience store charge was located on the Return to Nature ENT checking account for \$106.63. On 4/27/23, another Penrose Alta Convenience store charge was located on the Return to Nature ENT checking account for \$87.86. On 6/15/23, another Penrose Alta Convenience store charge was located on the Return to Nature ENT checking account for \$79.55. The Penrose Alta Convenience Store is approximately 1.1 miles from 31 Werner Rd, Penrose, CO.
189. There are approximately 39 miles between 944 Elkton Dr, Colorado Springs, Colorado and 31 Werner Rd, Penrose, Colorado. There is approximately 47 miles between the Hallford residence at 7639 Crestone Peak Trail and 31 Werner Rd. There are multiple cell phone towers between the Hallford's place of business, or residence, and the 31 Werner Rd, Penrose, CO address.
190. A logical and reasonable explanation for the travel pattern of the cell phones is due to the distance of travel between Colorado Springs and Penrose, CO. The Hallford's would collect multiple bodies, store them at their business location in Colorado Springs, and only make trips to Penrose when they had several bodies accumulated.

*The search of a burial site at Pikes Peak National Cemetery and disinterment*

191. Pikes Peak National Cemetery is a Department of Veteran Affairs (VA) national cemetery. Burial in a national cemetery is open to all members of the armed forces who have met a minimum active-duty service requirement and were discharged under conditions other than dishonorable. A Veteran's spouse, widow or widower, minor

dependent children, and under certain conditions, unmarried adult children with disabilities may also be eligible for burial. Eligible spouses and children may be buried even if they predecease the Veteran. Members of the reserve components of the armed forces who die while on active duty or who die while on training duty, or were eligible for retired pay, may also be eligible for burial.

192. Victim identified as E24 was an honorably discharged US Army Veteran who served in Vietnam and the Persian Gulf. According to his/her death certificate, E24 was buried in the Pikes Peak National Cemetery. On October 20, 2023, investigators visited the gravesite of E24, and found the information on the headstone to be consistent with E24's name, date of birth, and date of death.
193. It is impossible for E-24 to be buried in Pikes Peak National Cemetery. At the time of this affidavit, after E24's death, the remains of E24 are present within the El Paso County Coroner's Office. A medical tag and a confirmed fingerprint were used to identify E24.
194. A federal search warrant to exhume the casket buried at E24's burial site was obtained and authorized by US Magistrate Judge Varholak on October 24, 2023.
195. On October 26, 2023, the burial plot of E24 was exhumed. Investigators located a wood casket that was transported to the El Paso County Coroner's Office where it was X-rayed, opened and searched.
196. Inside the casket, the corpse of a female was located. The corpse was wrapped in duct tape, plastic sheets, and was heavily decomposed. One of the layers of plastic had a last name that was inconsistent with E24's last name written on it. The first initial was also present, inconsistent with E24.
197. I searched all death certificates created by Return to Nature and located a match for the female corpse recovered, identified by investigators as PP1, date of death PP1's death certificate lists that was cremated by Roselawn Crematory, however Roselawn had no record of her cremation.
198. Although a positive forensic confirmation had not been completed at the time of this affidavit, the remains within the casket are not those of E24.
199. According to the Director of the Pikes Peak National Cemetery, the date of interment of the casket was
200. Return to Nature Funeral Home accepted approximately \$2,078.26 in exchange for the burial of E24, a US Army Veteran, in a national cemetery. Instead, Return to Nature buried the body of PP1 in E24's place, and ultimately left E24's body to decompose with nearly 200 other bodies at 31 Werner Rd, Penrose, CO.
201. The below four photos show the headstone and place designed for E24's burial (with black boxes added to conceal his/her name), E24's body located at 31 Werner Rd, and the maggot infested condition of E24 when examined at the El Paso County Coroner's Office.

*Pikes Peak National Cemetery, the intended burial location of E24*

*The headstone for E24, the actual location of E24's body at 31 Werner Rd. and the condition of E24's body when opened at El Paso County Coroner's office*

*The use of illicit funds to purchase and sell 2021 GMC Yukon Denali for \$92,566*

202. Investigators located several vehicles registered to Jon or Carie Hallford in the State of Colorado. One of the vehicles is a 2021 GMC Yukon XL bearing vehicle identification number (VIN) \_\_\_\_\_ and Colorado license plate \_\_\_\_\_. Investigators located title history records for this vehicle, and learned it was purchased on November 26, 2021 from a privately owned Buick GMC dealership in Tulsa, OK.
203. A purchase agreement listed the purchasers as Jon Hallford, 815 E Platte Ave, Colorado Springs, CO, telephone number 719-290-6026. The cash price of the vehicle was listed at \$92,566. On February 11, 2022, Jon Hallford added his spouse, Carie Hallford, to the Colorado registration.
204. Investigators obtained wire transfer information from the car dealership related to the purchase of the \_\_\_\_\_ VIN number mentioned above. On November 30, 2021, a wire was initiated by Jon Hallford in the amount of \$92,955 from ENT Federal Credit Union Account \_\_\_\_\_ Hallfordhomes LLC DBA Return to Nature, wire number \_\_\_\_\_.
205. On or about November 26, 2021, the Hallford family was accepting payments from customers at Return to Nature Funeral Home under the false pretense that the funeral home would cremate or bury the remains of an individual. As mentioned above, bodies recovered inside of 31 Werner Rd, Penrose, CO had dates of death between \_\_\_\_\_ and \_\_\_\_\_.
206. The source of funds used to purchase the 2021 GMC Yukon would have reasonably included unlawfully obtained funds.
207. On June 13, 2022, Jon and Carie Hallford sold the 2021 GMC Yukon to Carmax in Colorado Springs for \$79,000. Carmax gave the Hallfords a \$79,000 check that was deposited into an ENT Federal Credit Union checking account \_\_\_\_\_, also on June 13, 2022.
208. The purchase of the Yukon and the sale of Yukon each are counts of money laundering in violation of CRS 18-5-309(1)(a)(II)(A).

*The use of illicit funds to purchase and sell a 2016 Infiniti SUV*

209. I also located the purchase of an Infiniti SUV, VIN# \_\_\_\_\_, on June 15, 2022. This vehicle was purchased in Denver, Colorado from a Larry Miller dealership. The total purchase price of the vehicle was approximately \$28,336, which was wire transferred from ENT Federal Credit Union account \_\_\_\_\_ to the dealership under wire number \_\_\_\_\_.
210. A purchase agreement listed the purchaser as Carie Lee Hallford, 815 E Platte Ave, Colorado Springs, CO, telephone number 415-377-7658. A copy of Jon Hallford's Colorado driver's license was also in the dealership records.
211. On May 10, 2023, the Hallfords sold the 2016 Infiniti to Carmax in Colorado Springs, CO for \$14,600. Carmax gave the Hallfords a check for payment.
212. An ENT Federal Credit Union receipt located in business records from 944 Elkton Dr showed a deposit of \$14,600 into Return to Nature's ENT account ending in \_\_\_\_\_ on May 11, 2023, which was confirmed in the ENT banking records.
213. The purchase of the Infiniti and the sale of Infiniti each are counts of money laundering in violation of CRS 18-5-309(1)(c)(II).

*Information obtained during victim family interviews*

214. During the process of notifying the families and/or next of kin for the corpses recovered during the investigation, law enforcement officers collected information about Return to Nature, Carie Hallford, and Jon Hallford. At the time of this affidavit, Approximately 75



is unknown who was actually cremated by Roselawn Crematory, and there may not ever be a way to identify who that person was.

226. Specifically, for the victim identified as D4, the Colorado Death Certificate indicated that he/she was cremated at Roselawn Crematory. Based on records obtained from Roselawn Crematory, they indicated they cremated D4. At the time of this affidavit, it is unknown who was actually cremated by Roselawn Crematory, and there may not ever be a way to identify who that person was.
227. Specifically, for the victim identified as N11, the Colorado Death Certificate indicated that he/she was cremated at Roselawn Crematory. Based on records obtained from Roselawn Crematory, they indicated they cremated N11. At the time of this affidavit, it is unknown who was actually cremated by Roselawn Crematory, and there may not ever be a way to identify who that person was.
228. Specifically, during a victim/family notification, investigators learned the family had paid Return to Nature to cremate \_\_\_\_\_ Investigators had recovered the body of one of the \_\_\_\_\_ at 31 Werner Rd. The family told investigators they retrieved the remains of the other \_\_\_\_\_ in \_\_\_\_\_ from Return to Nature, but cremation records indicated the individual was not cremated until \_\_\_\_\_
229. During the search of 31 Werner Rd, Penrose, Colorado, investigators located four babies and one umbilical cord.

*Request for NO BOND*

230. The purpose of bail is to ensure the defendant's presence at the time of trial and not to punish a defendant before he has been convicted.<sup>5</sup>
231. There is no combination of bond amounts or conditions that could guarantee the safety of the public, the safety of the defendant, and the guarantee the defendant would be present at a trial.
232. The defendant no longer has legitimate employment, and no ties to the community including residential property ownership. Press coverage during this investigation broadly and frequently published the defendant's name. Conversely, the defendant has ties to other states and the risk of flight to avoid prosecution is great. Prior to the issuance of an arrest warrant, law enforcement in Oklahoma attempted to contact the defendant on an Indian reservation on a separate matter. The defendant would not communicate with law enforcement.
233. Although the defendant does not have a criminal history that is inclusive of failure to appear or failure to comply charges, the defendant fled the State of Colorado on October 4, 2023 upon learning of the investigation. Significant resources are likely required to safely apprehend the defendant, including the possible use of specialized tactical teams.
234. Jon Hallford has several pending civil suits and appears to be behind on child support and other obligations. Jon Hallford was evicted from a business location and is in the process of being evicted from his Colorado Springs residence.
235. The offenses charged are egregious, and significant in potential consequences. Specifically, the defendant faces 12-18 month in the Colorado Department of Corrections for each of the 190 felony counts for abuse of a corpse. The potential penalties for the violations charged increase the risk for of non-compliance of any bond conditions proposed.
236. On October 30, 2023, a class action civil suit was filed against Jon and Carie Hallford.

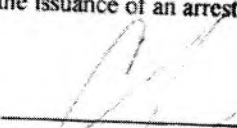
<sup>5</sup> Lucero v. District Court of Twelfth Judicial Dist., 532 P.2d 955,957 (Colo. 1975)




237. Based on the foregoing, the court is requested to issue the warrant with NO BOND.

*Conclusion*

238. The factors surrounding the recovery of the 189 bodies from 31 Werner Rd, Penrose, Colorado, and the body recovered from Pikes Peak National Cemetery, meet the elements for abuse of a corpse. The bodies were stored unrefrigerated, in rooms infested by bugs and the liquid decomposition of other bodies. In some instances, bodies were stacked on top of one another. Some bodies were stored in body bags with other bodies, including a fetus. Video evidence captured Jon Hallford dumping an uncovered human body off a gurney onto the floor and wiping decomposition onto other body bags.
239. Jon and Carie Hallford caused at least 190 death certificates to be issued with false information, based on their representations to the State of Colorado. These death certificates listed the bodies were cremated or buried and provided a specific location of cremation or burial. This is impossible, as these bodies were all later recovered from 31 Werner Rd, Penrose, Colorado. At least 58 of those death certificates meet the elements of forgery.
240. Further, Return to Nature Funeral Home buried the wrong body in the place of a US Army Veteran (E24) in the Pikes Peak National Cemetery. Investigators exhumed the casket designated for E24, and located a female who was reported by Return to Nature as cremated on her death certificate.
241. During the course of their business transactions, Jon and Carie Hallford stole money from the families, insurance companies, Colorado Victim Compensation Fund, and others by failing to uphold their contractual agreements. In many instances, families expected to receive an urn with the cremains of a loved one. Instead, they likely received a concrete based mixture.
242. Jon and Carie Hallford profited from the scheme to defraud and spent the unlawfully obtained proceeds on items such as a \$92,955 GMC Yukon and a \$28,336 Infiniti.
243. Based on the facts set forth above, I submit probable cause exists to believe that, between on or about January 1, 2019 and October 4, 2023, within the State of Colorado, and within El Paso County, the defendant, Carie Hallford, violated Colorado Revised Statutes §§ § 18-13-101(1)(b) (Abuse of a corpse, treatment, F6) 190 counts, 18-4-401(1)(b)(2)(g) (Theft, F5) 1 Count, 18-4-401-(1)(b)(2)(f) (Theft, F6) 4 counts, 18-5-309(1)(a)(II)(A)(Money Laundering, F3) 4 counts, and 18-5-102(1)(e) (Forgery, F5) 61 Counts.
244. Therefore, Your Affiant respectfully requests the issuance of an arrest warrant charging the same.

  
Applicant: Christopher Adams  
Colorado Bureau of Investigation  
Position: Agent

This affidavit was sworn and subscribed before me this day 7<sup>th</sup> of November, 2023.

  
Magistrate/Judge