District Court, Weld County, Colorado 910 10th Avenue Greeley, CO 80631	DATE FILIEDATAUGUSELDI, AUGUSTU, ENI 8
THE PEOPLE OF THE STATE OF COLORADO	
vs. CHRISTOPHER LEE WATTS, Defendant	□ COURT USE ONLY □
Michael J. Rourke Nineteenth Judicial District District Attorney, # 28812 P O Box 1167	Case No: D0622018CR002003
915 10th Street Greeley, CO 80632 Phone Number: 970-356-4010 Fax: 970-352-8023	Div: 5 Courtroom:
COMPLAINT AND INFORMATION	

DOMESTIC VIOLENCE

CHARGES: 9

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

COUNT 2: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a) (F1){01011}

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

COUNT 4: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(f) (F1){01018}

COUNT 5: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(f) (F1){01018}

COUNT 6: UNLAWFUL TERMINATION OF PREGNANCY IN THE FIRST DEGREE, C.R.S. 18-3.5-103(1),(2) (F2){01073}

COUNT 7: TAMPERING WITH A DECEASED HUMAN BODY, C.R.S. 18-8-610.5 (F3){26065}

COUNT 8: TAMPERING WITH A DECEASED HUMAN BODY, C.R.S. 18-8-610.5 (F3){26065}

COUNT 9: TAMPERING WITH A DECEASED HUMAN BODY, C.R.S. 18-8-610.5 (F3){26065}

Michael J. Rourke, District Attorney for the Nineteenth Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of Weld:

Case No.: D0622018CR002003

COUNT 1-MURDER IN THE FIRST DEGREE (F1)

On or about August 13, 2018, Christopher Lee Watts unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, caused the death of Shanann Watts; in violation of section 18-3-102(1)(a), C.R.S.

COUNT 2-MURDER IN THE FIRST DEGREE (F1)

Between and including August 12, 2018 and August 13, 2018, Christopher Lee Watts unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, caused the death of in violation of section 18-3-102(1)(a), C.R.S.

COUNT 3-MURDER IN THE FIRST DEGREE (F1)

Between and including August 12, 2018 and August 13, 2018, Christopher Lee Watts unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, caused the death of ; in violation of section 18-3-102(1)(a), C.R.S.

COUNT 4-MURDER IN THE FIRST DEGREE (F1)

Between and including August 12, 2018 and August 13, 2018, Christopher Lee Watts unlawfully, feloniously, and knowingly caused the death of a child who had not yet attained twelve years of age, and the defendant was in a position of trust with respect to the victim; in violation of section 18-3-102(1)(f), C.R.S.

COUNT 5-MURDER IN THE FIRST DEGREE (F1)

Between and including August 12, 2018 and August 13, 2018, Christopher Lee Watts unlawfully, feloniously, and knowingly caused the death of had not yet attained twelve years of age, and the defendant was in a position of trust with respect to the victim; in violation of section 18-3-102(1)(f), C.R.S.

COUNT 6-UNLAWFUL TERMINATION OF PREGNANCY IN THE FIRST DEGREE (F2)

Case No.: D0622018CR002003

On or about August 13, 2018, Christopher Lee Watts with the intent to terminate unlawfully the pregnancy of a woman, namely: Shanann Watts, feloniously and unlawfully terminated the pregnancy of the woman.

Further, the woman died as a result of the unlawful termination of the pregnancy, in violation of 18-3.5-103(1),(2), C.R.S

COUNT 7-TAMPERING WITH A DECEASED HUMAN BODY (F3)

On or about August 13, 2018, Christopher Lee Watts, believing that an official proceeding was pending, in progress, or about to be instituted, and acting without legal right or authority, unlawfully and feloniously willfully destroyed, mutilated, concealed, removed, or altered a human body, part of a human body, or human remains with intent to impair its or their appearance or availability in the official proceedings; in violation of section 18-8-610.5, C.R.S.

COUNT 8-TAMPERING WITH A DECEASED HUMAN BODY (F3)

On or about August 13, 2018, Christopher Lee Watts, believing that an official proceeding was pending, in progress, or about to be instituted, and acting without legal right or authority, unlawfully and feloniously willfully destroyed, mutilated, concealed, removed, or altered a human body, part of a human body, or human remains with intent to impair its or their appearance or availability in the official proceedings; in violation of section 18-8-610.5, C.R.S.

COUNT 9-TAMPERING WITH A DECEASED HUMAN BODY (F3)

On or about August 13, 2018, Christopher Lee Watts, believing that an official proceeding was pending, in progress, or about to be instituted, and acting without legal right or authority, unlawfully and feloniously willfully destroyed, mutilated, concealed, removed, or altered a human body, part of a human body, or human remains with intent to impair its or their appearance or availability in the official proceedings; in violation of section 18-8-610.5, C.R.S.

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

Michael J. Rourke District Attorney, #: 28812

By: /s/ Michael J. Rourke Date: 8/20/2018

Michael J. Rourke #: 28812

District Attorney

ENDORSED WITNESS LIST

Matthew James Frederick Police Department P O Box 435 Frederick, CO 80530 Shanann Watts

Case No.: D0622018CR002003

01/10/1984



Frank Rzucek Sr 135 Forest Drive Aberdeen, NC Sandra Rzucek 135 Forest Drive Aberdeen, NC 28315

Frank Rzucek Jr

David Baumhover Frederick Police Department P O Box 435 Frederick, CO 80530

Scott Coonrod Frederick Police Department P O Box 435 Frederick, CO 80530 Dan Boyle Weld County District Attorneys Office 915 10th Street P O Box 1167 Greeley, CO 80632

Joseph Deangelo Weld County District Attorneys Office 915 10th Street P O Box 1167 Greeley, CO 80632 Cayley Chiodo Weld County District Attorneys Office 915 10th Street P O Box 1167 Greeley, CO 80632

Kathy Holscher Weld County District Attorneys Office 915 10th Street P O Box 1167 Greeley, CO 80632 Carl Blesh Weld Coroners Office 915 10th Street Greeley, CO 80632

Michael Burson Larimer County Coroners Office 495 N Denver Ave Loveland, CO 80537 Todd Norris Frederick Police Department P O Box 435 Frederick, CO 80530

Robert Bedsaul

Frederick Police Department

Case No.: D0622018CR002003

P O Box 435

Frederick, CO 80530

Aaron Herbert

Frederick Police Department

Frederick Police Department

P O Box 435

Dave Egan

P O Box 435

Frederick, CO 80530

Frederick, CO 80530

Matthew James

Frederick Police Department

P O Box 435

Frederick, CO 80530

Ian Albert

Frederick Police Department

P O Box 435

Frederick, CO 80530

Jared Bakes

Frederick Police Department

P O Box 435

Frederick, CO 80530

Ivan Perez

Frederick Police Department

P O Box 435

Frederick, CO 80530

Edward Goodman

Frederick Police Department

P O Box 435

Frederick, CO 80530

Nicole Utoft - Atkinson

Address Pending

Andrew Fairbanks

Frederick Police Department P O Box 435

Frederick, CO 80530

Brent Manley

Frederick Police Department

P O Box 435

Frederick, CO 80530

Steve Walje

Frederick Police Department

P O Box 435

Frederick, CO 80530

Kenneth Doll

Frederick Police Department

P O Box 435

Frederick, CO 80530

Brad Davies

Frederick Police Department

P O Box 435

Frederick, CO 80530

Kate Lines

Frederick Police Department

P O Box 435

Frederick, CO 80530

Lindsey Meredith

Frederick Police Department

P O Box 435

Frederick, CO 80530

Paul A Scarlett II Frederick Police Department P O Box 435 Frederick, CO 80530

Bryce E Borders Firestone Police P O Box 100 Firestone, CO 80520

Jessie Lambert Dacono Police Department P O Box 117 Dacono, CO 80514

Kirby Lewis Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Greg Zentner Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Kellon Hassenstab Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Jillian Ganley Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Dave Yocum Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215 Amanda Purcell Frederick Police Department P O Box 435 Frederick, CO 80530

Case No.: D0622018CR002003

William Dewitt Firestone Police P O Box 100 Firestone, CO 80520

Jackie Boyer Dacono Police Department P O Box 117 Dacono, CO 80514

Tammy Lee Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Erick Bryant Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Matt Sailor Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Ryan Heffner Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Dave Maloney Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215 Kaitlin Schroeder Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Kevin Koback Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Grahm Coder FED BUREAU OF INVEST Federal Bureau of Investigation 2915 Rocky Mountain Ave Loveland, CO 80238

Nichol Kessinger Address Pending , CO

Wesley Garrett Weld Coroners Office 915 10th Street Greeley, CO 80632

Dan Volz Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Nate Mcmanus Longmont Police Department 225 Kimbark Street Longmont, CO 80501

Marc Lehrer FED BUREAU OF INVEST Federal Bureau of Investigation Ft Collins, CO Stacy Galbraith Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Case No.: D0622018CR002003

Kevin Hoyland FED BUREAU OF INVEST Federal Bureau of Investigation 2915 Rocky Mountain Ave Loveland, CO 80538

Todd Sandstedt FED BUREAU OF INVEST Federal Bureau of Investigation 2915 Rocky Mountain Ave Loveland, CO 80538

Kodi Roberts 3613 W 29th St #6 Greeley, CO 80634 09/14/1995

Chris Schaefer Colo Bureau of Investigations 690 Kipling Street Suite 3000 Denver, CO 80215

Jocelyn Plascencia Longmont Police Department 225 Kimbark Street Longmont, CO 80501

Phil Jones FED BUREAU OF INVEST Federal Bureau of Investigation Ft Collins, CO

John Hause FED BUREAU OF INVEST Federal Bureau of Investigation Ft Collins, CO

Case No.: D0622018CR002003

Custodian Of Records & Evidence Frederick Police Department Po Box 639 Frederick, CO 80530

Sam Paisley Address Pending , MD

Jeremy Linstrom Address Pending Erie, CO

Nathan Trinastich 2905 Saratoga Trail Frederick, CO 11/04/1978 Addy Moloney Address Pending , MD

Christina Meechum Address Pending , HI

Cindy Derosett Address Pending , AZ

Taylor Welch

DEFENDANT INFORMATION

Case No.: D0622018CR002003

DOB: <u>5/16/1985</u>

Race: W Gender: M

Height: 510 Weight: 225 Hair: BLK Eye: BRO

Birthplace: Tattoo:

Address: <u>2825 SARATOGA TRL</u>

FREDERICK, CO 80516

Home Phone #: - Work Phone #: -

AKA:

CASE INFORMATION

Arresting Agency: Frederick Police Department

Arresting ORI: CO0621700 Other Number:

Offense Agency: Frederick Police Department

Offense ORI: CO0621700

Arrest #: <u>18-12255</u> Agency Case #: <u>1806743</u>

Date of Arrest: <u>08/15/2018</u> BAC: _____

CCIC#: _____ NCIC #: SID#: