

DISTRICT COURT, JEFFERSON COUNTY, COLORADO
Jefferson County Court & Administrative Facility
100 Jefferson County Parkway
Golden, Colorado 80401

THE PEOPLE OF THE STATE OF COLORADO,

Plaintiffs,

vs.

JANE DOE,
JOHN CHARLES HUGGER,
JOHN and JANE DOE(S),

Defendants.

↑ COURT USE ONLY ↑

FIRST CRIMINAL COMPLAINT

I, the undersigned victim/complainant/affiant, state under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

COUNT 1

All through her divorce (see case 00DR000), and to this day, JANE DOE (JANE), my now ex-wife, knowingly exercised control over my eight motor vehicles worth approximately \$33,250.00, without my authorization, committing aggravated motor vehicle theft in the first degree in violation of C.R.S. § 18-4-401(2)(a), a class 4 felony according to C.R.S. § 18-4-401(3)(a.5).

COUNT 2

During and after her divorce, and to this day, JANE, and her attorney JOHN CHARLES HUGGER (HUGGER), conspired to permanently deprive me of my eight motor vehicles by fraud upon the courts, each agreeing with the other that JANE would steal the vehicles and HUGGER would orchestrate the fraud by concealment, in violation of C.R.S. § 18-2-201.

COUNT 3

During her divorce, JANE and HUGGER suppressed the fact that JANE was exercising control over my eight motor vehicles, and in the post-divorce, JANE falsely stated in an affidavit that ownership of my vehicles was still “in question”, in violation of Title 18, Article 5 of Colorado's Criminal Code regarding offenses involving fraud, and in violation of other state and federal laws and common law with respect to fraud.

DATED this 1st Day of February 2016.

By Victim/Complainant: John Doe
*Individually, and in behalf of my children: Bubba,
Speedy, Buddy, Smarty, and Sweetie Doe*

AFFIDAVIT IN SUPPORT OF FIRST CRIMINAL COMPLAINT

I, the undersigned victim/affiant, state under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

VICTIMS AND SUSPECTS:

1. I, JOHN DOE, am a direct victim of the crimes alleged herein. I am over the age of 21, am competent to testify, have personal knowledge of the crimes alleged herein, and have verifiable evidence to prove my allegations herein, some of which is attached.
2. My five children, BUBBA, SPEEDY, BUDDY, SMARTY, and SWEETIE DOE, are indirect victims of the crimes alleged herein. All of my children were minors when the crimes took place. Brandon, Tyler and Nathan are over the age of 21. A.N. is still a minor. None of my children have personal knowledge of the crimes alleged herein; however, all of my children are witnesses to the facts relating to my vehicles.
3. Suspect JANE DOE (JANE) is my ex-wife, and currently resides at 456 Any Street, Any Town, CO 00000.
4. Suspect JOHN CHARLES HUGGER (HUGGER) was my ex-wife's attorney during and after her divorce, his law office is located at 3002 Evergreen Pkwy, Evergreen, CO 80439.
5. Suspect(s) JOHN and JANE DOE(S) are other individuals who may be found during the investigation to have been involved in the crimes alleged herein.

GENERAL FACTS ESTABLISHING PROBABLE CAUSE:

6. I solely own the following eight motor vehicles:
 - a. 1996 Dodge Ram 250 pickup (inherited from my deceased brother "Joe")
 - b. 1979 Dodge Cargo Van
 - c. 1987 Suzuki Samurai (inherited from Joe)
 - d. 1980 Yamaha Motorcycle (inherited from Joe)
 - e. 2001 Skidoo 800 snowmobile
 - f. 2001 Skidoo 600 snowmobile (inherited from Joe)
 - g. 2004 Skidoo 800 snowmobile (inherited from Joe)
 - h. 1976 Hammond I/O Boat (inherited from my deceased "Dad")
7. JANE filed for divorce on January 25, 2005 – *see case 00DR000*.
8. JANE and HUGGER staged an argument on March 18, 2005, JANE made a phony 911 call to have me arrested, removed from our home and charged with domestic violence, and JANE has kept "my things" ever since; *see Exhibit CO-901*.
9. Through my attorneys during the divorce and on my own after the divorce, I made at least 26 written requests to JANE and HUGGER for my things¹, including my eight motor vehicles, but all of my requests were either denied or ignored.
10. Acting on HUGGER's advice, JANE continued to hold on to my things, including my automobiles and recreational vehicles, during and after her divorce with the intent to permanently deprive me of my things.

¹ See pp 11-24 of Exhibit B1 in my "EXHIBIT BOOK," filed along with my MOTION AND AFFIDAVIT TO MODIFY PARENTAL RESPONSIBILITIES, dated October 1, 2015, in case 00DR000.

11. By concealment of material facts, including the fact that JANE was still in possession of my things, JANE and HUGGER defrauded the courts and other officials to accomplish the theft of my vehicles.

12. JANE and I were divorced on March 28, 2006.

13. "Permanent Orders" in JANE's divorce were issued on May 30, 2006; however, were automatically rendered void, *ab initio*, due to any one of JANE's or HUGGER's frauds upon the court, including the fraud by concealment alleged herein.

14. During and after JANE's divorce, I reported these thefts to the judges and magistrates involved, to local, state and federal law enforcement and other officials, and to the highest authorities in Colorado, but nothing was ever done.

15. In the summer of 2006, I reported these thefts and the theft of my tools and work equipment to caseworker Lisa McGuire with Jefferson County Child Support Services (Jeffco-CSS), but nothing was ever done.

16. During Jeffco-CSS's review in 2009, JANE claimed in an sworn affidavit that ownership of my vehicles was still "in question."²

17. In 2009/2010, I filed over 50 motions³ in 05DR212 to recover my things, including my eight motor vehicles, but JANE failed to return a single thing, not even my deceased parent's portrait or Joe's cremated ashes.

SPECIFIC FACTS PROVING THE ELEMENTS OF EACH CRIME:

18. JANE committed and HUGGER aided in the crime of aggravated motor vehicle theft in the first degree, as follows:

- a. Acting on HUGGER's advice, JANE knowingly exercised control over my automobiles and recreational vehicles throughout her divorce, and retained my eight vehicles after her divorce.
- b. JANE exercised control over my eight motor vehicles without my authorization.
- c. JANE intended to permanently deprive me of the use and benefit of my automobiles and recreational vehicles.

19. JANE and HUGGER conspired to commit the crime of aggravated motor vehicle theft in the first degree, as follows:

- a. As part of their vicious overall objective to steal my life's work during the divorce, JANE's and HUGGER's object of this theft was to injure me psychologically, i.e. to 'salt my wounds.'
- b. To accomplish this objective, the following specific agreements were made:
 1. JANE agreed to keep my vehicles during and after her divorce.
 2. HUGGER agreed to suppress the facts to my attorneys and the courts regarding JANE's possession of my vehicles all through the divorce.
 3. JANE agreed to pretend as though ownership of my vehicles was in question.

² See pp 23 of Exhibit B4 in my EXHIBIT BOOK.

³ See pp 24-25 of Exhibit B1 in my EXHIBIT BOOK.

4. Several witnesses (DOEs) agreed to keep their mouths shut about these thefts.
- c. In furtherance of this objective, the conspirators ignored my repeated requests for my things, and the following specific actions were taken:
 1. JANE kept my vehicles during and after her divorce.
 2. HUGGER suppressed the facts to my attorneys and the courts regarding JANE's possession of my vehicles all through the divorce.
 3. JANE pretended as though ownership of my vehicles was in question.
 4. Several witnesses (DOEs) have seen my vehicles on a number of occasions and have therefore witnessed these thefts, but have kept their mouths shut to this day.
20. JANE and HUGGER committed the crime of aggravated motor vehicle theft in the first degree by the fraud of concealment, as follows:
 - a. HUGGER and JANE suppressed the fact that JANE was exercising control over my eight motor vehicles during and after the divorce; in the post-divorce, JANE falsely stated in an sworn affidavit that ownership of my vehicles was “in question.”
 - b. HUGGER and JANE concealed material facts regarding my vehicles.
 - c. HUGGER and JANE both knew at the time that:
 1. I had inherited all but two of the vehicles from my brother Joe and my Dad;
 2. Probate of Joe's estate was settled during the divorce, and his vehicles became mine;
 3. I was the sole-owner of all eight vehicles; and
 4. They were committing fraud, conspiracy and theft.
 - d. HUGGER and JANE intended to conceal the facts from the judges and other officials involved to accomplish the theft of my eight vehicles.
 - e. The judges and other officials involved are partly to blame because they knowingly ignored the fact that JANE kept possession of my things, including my eight vehicles.

OTHER WITNESSES (AND/OR SUSPECTS):

21. The following are witnesses to the crimes alleged herein:
 - a. **E. Gay Niermann:** Appointed the “Child and Family Investigator” in JANE's divorce, Niermann learned from me that JANE had continued to hold my things, including my vehicles, tools and work equipment, and many other things; and witnessed many of these things on our property during her visit to our home. Niermann aided in this theft by failing to report it and aided in JANE's theft of my share of our real estate property with her Report and Recommendations.
 - b. **Becky B. and Sue W.:** JANE's sisters in Minnesota aided in JANE's frauds, thefts, child abuses, domestic violence against me, and many other crimes. In regards to this particular theft, Becky and Sue have both seen my vehicles on a number of occasions and have therefore witnessed these thefts, but have kept their mouths shut to this day; and, on information and belief, encouraged JANE to keep my vehicles.
 - c. **Jon and Karen B.:** Former mutual friends, this husband and wife duo aided in JANE's thefts, child abuses, domestic violence against me, and many other crimes. In regards to

Exhibit CO-901

“MASTER LIST” of “My Things”

Personal property of John Doe held by Jane Doe since March 18, 2005, including my deceased brother “Joe’s” things and my deceased “Dad’s” things. Actual values are conservatively estimated for each valuable item at the time of the theft on March 18, 2005, to the best of my knowledge and belief.

Items of inestimable sentimental value are “priceless” to me.

See Respondent's exhibit RR in 00DR000 for photographs of most items.

PRICELESS ITEMS:

Joe’s cremated ashes, container, and memorial with 6 engraved brass tubes and wooden cross.

My Mom and Dad’s portrait, my premarital photo and slide albums, my premarital books, and Joe’s videotapes and movie camera bag.

Half of our children’s school pictures for each year for each child.

Half of our pictures and videos taken during marriage.

Four copies of the 1999 Kansas City newspaper with the picture entitled, “You Go, Dad”, and at least one copy of all other articles regarding any of our children.

All of my Dad’s things retrieved from Minnesota after his death including several boxes full of framed pictures, tools, Coca-Cola items, mementos, memorabilia, and many other items.

All of Joe’s things retrieved from his apartment after his death including approximately 25 boxes containing his personal belongings, his collector toy trucks, tractors, farm machinery, motorcycles, and construction equipment, 3 embossed Super Bowl footballs with stands, framed pictures, tools, mementos, memorabilia, furniture including a stackable wood and glass antique green display case, an entertainment center, chairs, a computer, telescope, which were all stored in the shop; and several boxes full of Joe’s most precious and valuable things, which were stored under my desk in my cabin office; antique Coca-Cola 2-wheel cart.

VALUABLE ITEMS:

Est. Value:

My premarital artwork:

- | | |
|---|-------------|
| 1. Framed picture entitled “Heading Home” by Terry Redlin;
[https://www.christcenteredmall.com/stores/art/redlin/heading-home.htm] | \$ 1,645.00 |
| 2. Framed picture entitled “Headin’ for Shelter” by Les Kouba; and
[http://www.prints.com/art.php/Les_Kouba/?artist_id=294] | 925.00 |
| 3. Two mounted poster-size photographs I took in Utah.
[\$500.00 each] | 1,000.00 |

Business office equipment, accessories and software:

- | | |
|--|--------|
| 1. Dell Dimension 8100 – Tower, monitor, keyboard, mouse, startup CDs, etc.; | 750.00 |
| 2. All accounting software, “TurboTax”, etc.; | 250.00 |
| 3. Hewlett Packard LaserJet 4P printer; | 250.00 |
| 4. Lexmark X4270 All-in-one fax, scanner, copier, printer; | 100.00 |
| 5. Digital camera with it’s box, and all accessories; | 150.00 |
| 6. Land-line telephone, cordless telephone, telephone recorder ... | 200.00 |
| 7. My shop desk, 2 office desks in cabin & 1 desk in house, and 2 office chairs; | 500.00 |
| 8. My “Thomas Register” catalogs; | 250.00 |
| 9. All other office equipment, accessories ... | 150.00 |

Guns and gun related items:

1. My 25:06 rifle with scope;	750.00
2. My 12-gauge shotgun;	500.00
3. My 20-gauge shotgun;	250.00
4. My 22 rifle with scope;	250.00
5. Joe's 30:06 rifle with scope;	750.00
6. Joe's 12-gauge shotgun;	500.00
7. Joe's 4/10-gauge shotgun;	250.00
8. Joe's 22 rifle;	200.00
9. Dad's 30:06 rifle with scope;	1,500.00
10. Dad's 12-gauge shotgun;	750.00
11. My handmade wooden gun case;	250.00
12. Several gun carrying cases, my gun cleaning kit, two ammo boxes; and	200.00
13. All other gun related items.	200.00

Woodworking tools and equipment:

1. Joe's Stihl chainsaw and all accessories;	350.00
2. My Stihl chainsaw (purchased in 2004) and all accessories;	900.00
3. My Homelite chainsaw and case and all accessories;	100.00
4. My 6-piece male and female "Forstner" ... ;	100.00
5. My other guides and bits; and	50.00
6. My sharpening tools and stones.	50.00

Other tools and equipment:

1. My extension ladder and planks;	500.00
2. My yellow step ladder and steel paint ladder;	100.00
3. Joe's pickup "headache rack" for transporting ladders, pickup toolbox ... ;	650.00
4. My jumping-jack compactor;	2,000.00
5. Dad's wood-splitter;	1,500.00
6. My wheelbarrow;	100.00
7. My bull float and all concrete and gardening tools and other items;	500.00
8. My transit level; and	750.00
9. All other tools and equipment.	250.00

My intellectual property, including but not limited to the 26 computer forms and spreadsheets I created for estimating, bidding, and proposing construction work. 28,500.00¹

Automobiles and recreational vehicles:

1. Dad's 1976 Hammond I/O Boat;	2,500.00
2. My 1979 Dodge B250 Cargo Van;	500.00
3. Joe's 1980 Yamaha Motorcycle;	750.00
4. Joe's 1987 Suzuki Samurai;	1,000.00
5. Joe's 1992/1996 Dodge Ram 250 Pickup;	7,500.00
6. My 2001 Skidoo Summit 800;	6,000.00
7. Joe's 2001 Skidoo Summit 600; and	3,000.00
8. Joe's 2004 Skidoo HM Extreme 800 HO.	12,000.00

All building materials including shingles, roll roofing, tar paper, wood and vinyl siding, bags of concrete, insulation, lumber, etc.; other building equipment including scaffolding, planks and beams; and fuel tank, culverts, and the other items 2,500.00

¹ Value established during MSE lawsuit in 2005.

that were stored on west side of home.

Half of the value of the 4392-piece Beanie Baby collection.	64,406.00
Half of the framed and unframed Art Partner's collection.	2,000.00
Half of all other collections.	500.00
Half of the household furniture, furnishings, electronics and appliances.	5,000.00
Miscellaneous personal property:	
1. My sleeping bag, the kid's sleeping bags, and all camping equipment ... ;	500.00
2. Vacuum hair cutter, Bisell carpet shampooer, and half of the wedding gifts;	500.00
3. My television, malt-maker, blender, and other incentive gifts from Lifequotes;	500.00
4. My golf clubs and bag; skis, boots and poles; and other sporting equipment.	500.00

TOTAL: **\$ 158,576.00**

[*Family business inventory*] All logs: With and without bark, draw-knifed, cut and split, or erected for the frame of the unfinished storage shed; and branches and bark-chips.

Value to be determined at trial.

Joe's Titles and Bills of Sale
[From Respondent's exhibit Z in 00DR000]

Dodge Pickup

Suzuki Samarai

Yamaha Motorcycle

OFFICE OF TITLE
 STATE OF MISSISSIPPI
 TITLE AND REGISTRATION DEPARTMENT
 1000 W. GULF BLVD., SUITE 1000
 BILOBI, MISSISSIPPI 39201-1000
 (601) 353-2337

VEHICLE IDENTIFICATION NUMBER: 1D4HJ4GK8D6A111111
 VIN: 1D4HJ4GK8D6A111111
 MAKE: DODGE
 MODEL: PICKUP
 YEAR: 2004
 COLOR: BLACK
 WEIGHT: 4500 LBS
 GROSS WEIGHT: 6500 LBS
 COUNTRY OF ORIGIN: USA
 TITLE NO: 123456789
 REGISTRATION NO: 987654321
 SALES TAX NO: 111111111
 EXCISE TAX NO: 222222222
 TOTAL TAXES: \$111.11
 SALES PRICE: \$1111.11
 NET PRICE: \$999.99
 SALES TAX: \$111.11
 EXCISE TAX: \$222.22
 TOTAL: \$1333.32

OFFICE OF TITLE
 STATE OF MISSISSIPPI
 TITLE AND REGISTRATION DEPARTMENT
 1000 W. GULF BLVD., SUITE 1000
 BILOBI, MISSISSIPPI 39201-1000
 (601) 353-2337

VEHICLE IDENTIFICATION NUMBER: JS3A123456789
 VIN: JS3A123456789
 MAKE: SUZUKI
 MODEL: SAMARAI
 YEAR: 2004
 COLOR: RED
 WEIGHT: 350 LBS
 GROSS WEIGHT: 400 LBS
 COUNTRY OF ORIGIN: JAPAN
 TITLE NO: 987654321
 REGISTRATION NO: 123456789
 SALES TAX NO: 111111111
 EXCISE TAX NO: 222222222
 TOTAL TAXES: \$111.11
 SALES PRICE: \$1111.11
 NET PRICE: \$999.99
 SALES TAX: \$111.11
 EXCISE TAX: \$222.22
 TOTAL: \$1333.32

OFFICE OF TITLE
 STATE OF MISSISSIPPI
 TITLE AND REGISTRATION DEPARTMENT
 1000 W. GULF BLVD., SUITE 1000
 BILOBI, MISSISSIPPI 39201-1000
 (601) 353-2337

VEHICLE IDENTIFICATION NUMBER: YFZ123456789
 VIN: YFZ123456789
 MAKE: YAMAHA
 MODEL: MOTORCYCLE
 YEAR: 2004
 COLOR: BLACK
 WEIGHT: 300 LBS
 GROSS WEIGHT: 350 LBS
 COUNTRY OF ORIGIN: JAPAN
 TITLE NO: 123456789
 REGISTRATION NO: 987654321
 SALES TAX NO: 111111111
 EXCISE TAX NO: 222222222
 TOTAL TAXES: \$111.11
 SALES PRICE: \$1111.11
 NET PRICE: \$999.99
 SALES TAX: \$111.11
 EXCISE TAX: \$222.22
 TOTAL: \$1333.32

Award Letter-800 Snowmobile

Bill of Sale-600 Snowmobile

NOV 20 2004

NO. 80

Dear Sir,

Congratulations! I am happy to inform you that you have been awarded our 800cc Snowmobile. This award is a result of your participation in the 2004 Snowmobile Contest. The award is a 2004 Arctic Cat 800cc Snowmobile (make and model as listed below).

You will be required to sign an affidavit of ownership for this snowmobile. Please return this affidavit to the award coordinator at the office of the contest. The award will be made available to you at the office of the contest. The delivery of the snowmobile is subject to your signature on the award document. If you do not sign the award document, the award will be forfeited. The award is subject to the terms and conditions of the award document.

The award is being presented to you on this date and is subject to the award document. The award is subject to the terms and conditions of the award document.

Respectfully,
 Markie Davis
 Marketing Agent

Enclosure

XTREME PERFORMANCE GOOBYL

600A 600 02
 2004 02 07 15
 200-544-4447
 600-444-4444 600

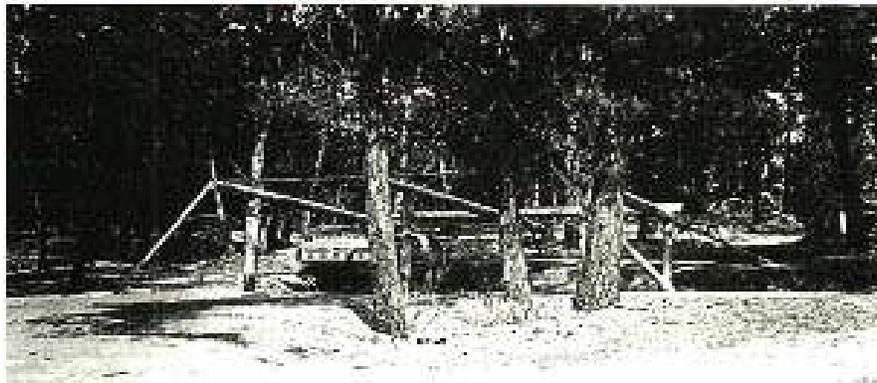
Sales Receipt

NO. 600

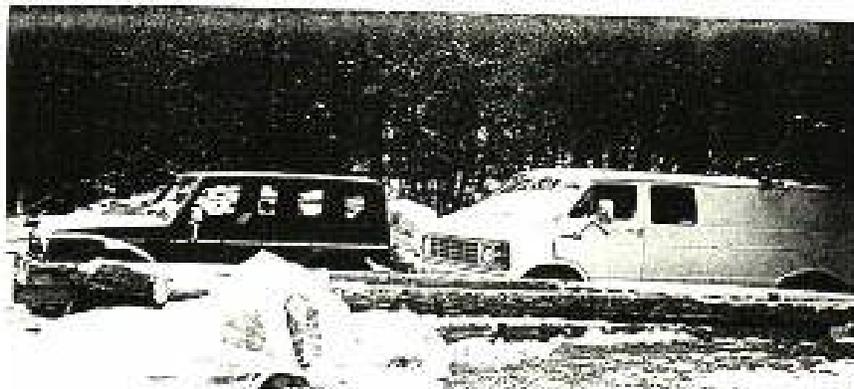
QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
1	600A 600 02	600.00	600.00
1	2004 02 07 15	500.00	500.00
1	200-544-4447	100.00	100.00
1	600-444-4444 600	100.00	100.00
	TOTAL		1300.00

Check Cash Credit Debit

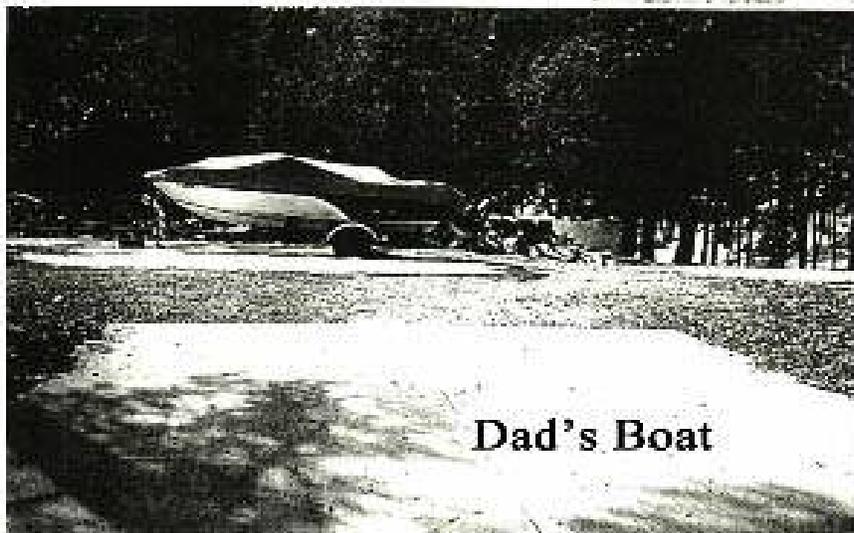
Pictures of Vehicles
[From Respondent's exhibit LL in 00DR000]



Joe's Dodge Pickup / My log storage shed under construction



Joe's Suzuki Samurai / My Dodge Cargo Van



Dad's Boat

