

DISTRICT COURT, MESA COUNTY, STATE OF COLORADO

CASE NUMBER 23CR 311

Office of the District Attorney, 21st Judicial District

RE: DA's Office: 23-31

ARREST WARRANT

THE PEOPLE OF THE STATE OF COLORADO,

TO: **ANY PEACE OFFICER IN THE STATE OF COLORADO, INTO WHOSE HANDS THIS WARRANT SHALL COME, GREETINGS:**

WHEREAS, Michael Struwe, a peace officer, has made Application and Affidavit for the issuance of an Arrest Warrant; and,

WHEREAS, the Application appears proper, and this Court is satisfied that there is probable cause to believe that the person named in the Application has committed the offenses of:

CRS § 18-8-306:	Attempt to influence a public servant	F4 (3 ct.)
CRS § 18-8-404(1)(a)/(c):	First degree official misconduct	M1

YOU ARE THEREFORE COMMANDED TO ARREST

**ADAM CHARLES HANNA DOB: 02/10/89
WM / 5'9" tall / 180 pounds / Blonde hair / Blue eyes**



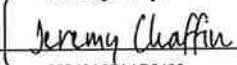
and bring him/her without unnecessary delay before the nearest available Judge of the County or District Court.

No Bond

It is therefore ordered that Bond Is set in the amount of \$ _____

DONE this date 3/23/2023 | 18:19 MDT

BY THE COURT

DocuSigned by:

 62342A6FAAD8490... JUDGE

Return of Service

I certify I arrested this person on _____ at _____
Date / Time

_____, _____ County, State of _____
Location County Name State Name

Officer

DISTRICT / COUNTY COURT, MESA COUNTY, STATE OF COLORADO

CASE NUMBER 23CR

Office of the District Attorney, 21st Judicial District

RE: DA's Office: 23-31

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

IN THE MATTER OF:

The People of The State of Colorado

V.

ADAM CHARLES HANNA

and in support of the Application for Arrest Warrant, Investigator Michael Struwe presents the following Affidavit in support of Arrest Warrant and asserts the following:

1. That I am of lawful age and a duly sworn law enforcement officer currently employed by the 21st Judicial District of Colorado, Office of the District Attorney and was so at all times relevant to the facts contained herein. All of the information herein contained was compiled by me in the course of a criminal investigation, including reviewing official reports and documents, speaking with fellow law enforcement officers, and interviews with named citizens. All locations referred to are in the County of Mesa, State of Colorado, unless specifically noted otherwise.

Case Summary

2. Former CO POST-certified peace officer ADAM HANNA was employed with various law enforcement agencies in and outside the State of Colorado. In 2021, he was charged with several felonies and a disqualifying misdemeanor in the 15th Judicial District related to his alleged unauthorized and fictitious printing of a police credential that was used for personal gain. That case was dismissed upon HANNA's completion of a diversion program. He remained in law enforcement in Colorado; however, the CO POST (Peace Officer Standards and Training) board must revoke the certification of any peace officer who enters into a diversion agreement for any disqualifying offense if the board determines that "certification is not in the public interest." During the subsequent POST procedures, HANNA altered crucial facts and grossly distorted his law enforcement experience in an attempt to influence the board on whether or not to revoke his certification. HANNA also used his position as a public servant to advance his claims. His actions persuaded the board to grant an appeal, but ultimately, the board voted to revoke his certification. Since HANNA's intentions were made manifest at an in-person board meeting that occurred in Grand Junction, CO, and because POST board members and staff are victims, POST requested an investigation by the 21st District Attorney's Office. Subsequent examination confirms that on numerous occasions, HANNA made demonstrably false and misleading statements to various public servants, including top Colorado government officials, in order to influence their vote on whether or not to revoke his POST certification.

“LEOSA”

3. In 2004, U.S. Congress passed H.R.218 – Law Enforcement Officers Safety Act. This law is commonly referred to by pronouncing its acronym, “LEOSA” (lee-o-suh), citing “HR218,” or referencing the federal statute, 18 USC §926. LEOSA exempts qualified current and former law enforcement officers from state laws prohibiting the carrying of concealed firearms, with certain restrictions. LEOSA has been amended several times, most recently in 2013.
4. LEOSA has two readily distinguishable applications, 1) those for qualified active law enforcement officers and 2) those for qualified retired law enforcement officers.

LEOSA: Active Officers

5. The statute pertaining to active law enforcement officers is found at 18 USC §926B. In summation, §926B conveys that: 1) a qualified active law enforcement officer 2) carrying the required identification 3) may carry a concealed firearm 4) shipped or transported in interstate commerce.
6. §926B defines the required identification as “the photographic identification issued by the governmental agency for which the individual is employed that identifies the employee as a police officer or law enforcement officer of the agency.”
7. §926B defines “qualified law enforcement officer,” including specific employment criteria and restrictions (e.g., those who investigate violations of law, have arrest powers, qualify with firearms, and restrictions against intoxication while carrying a firearm). Substantive to this investigation, §926B also reads, “...the term ‘qualified law enforcement officer’ means an employee of a governmental agency...” §926B also includes language specific to apprehension powers under the Uniform Code of Military Justice which is largely viewed to include active Military Police employment.

LEOSA: Retired Officers

8. The statute for qualified retired law enforcement officers is found at 18 USC §926C. In summation, §926C conveys that: 1) a qualified retired law enforcement officer 2) carrying the required identification 3) may carry a concealed firearm 4) shipped or transported in interstate commerce.
9. §926C has a lengthy definition of the required identification, but it can be summarized as requiring 1) a photographic identification credentialing the individual who separated from the agency as having been employed as a law enforcement officer and 2) that the individual has, within the last year, qualified with a firearm of the same type as the concealed firearm. §926C provides two ways to exhibit the identification requirements for retired officers:
 - a. a single document containing both the required photo credentialing and the firearms qualifications attested to by the agency; or
 - b. a document containing the required photo credentialing attested to by the agency, coupled with a separate certification of firearms qualification issued by the state or a certified firearms instructor.

10. §926C has a lengthy definition of “qualified retired law enforcement officer,” but for the purposes of this investigation, it can be distilled down to specific, prior employment criteria and restrictions (e.g., those who investigated violations of law, had arrest powers, qualify with firearms, and restrictions against intoxication while carrying a firearm). Substantive to this investigation, §926C has the additional requirements that the retired officer “separated from service in good standing...,” and “before such separation, served as a law enforcement officer for an aggregate of 10 years or more.” §926C also includes language specific to apprehension powers under the Uniform Code of Military Justice which is largely viewed to include retired Military Police.

Colorado Reserve Officers

11. CRS §16-2.5-110 defines “reserve officer” at length. Relevant to the facts of this investigation, “reserve officer” includes the following definitions: “Reserve officer means a person authorized by a city, city and county, town, [or] county...within this state to act as a reserve police officer, reserve deputy sheriff, or reserve town marshal for certain specific and limited periods of time while the person is authorized to be on duty and acting at the express direction or under the direct supervision of a fully P.O.S.T.-certified peace officer...[a] reserve officer is a peace officer while engaged in the performance of his or her duties whose authority shall be limited to the authority granted by his or her authorizing agency.” “A reserve officer...may be a fully P.O.S.T.-certified peace officer serving as a volunteer and may be granted full peace officer status and authority at the discretion of the appointing authority.” “A reserve officer may be compensated for his or her time during a declared emergency or during a time of special need. In all other circumstances, a reserve officer shall serve without compensation...” “The city, city and county, town, [or] county...shall pay the cost of workers’ compensation benefits for injuries incurred by a reserve officer while on duty and while acting within the scope of his or her assigned duties. A reserve officer is an authorized volunteer for purposes of article 10 of title 24, C.R.S.” The law also permits reserve officers to be reimbursed for authorized out-of-pocket expenses incurred while on duty.
12. Colorado law allows a POST-certified peace officer or reserve peace officer to keep his or her certification current as long as he or she serves as a peace officer or reserve peace officer for a total of at least six months during any consecutive three-year period. Being a reserve officer in Colorado allows one to volunteer one’s time and gain experience performing law enforcement duties, but also acts as a means to maintain certification while not actively employed in law enforcement.
13. Colorado law has a broad definition of “employee.” Individuals who perform services for pay for another are deemed an employee. Colorado statutes and case law mandate that voluntary peace officers (reserve officers) must be provided workers’ compensation benefits and are included in the definition of “employee” for the purpose of workers’ compensation if they are injured while in the actual performance of their duties.
14. Reserve officer duties vary between agencies, but by nature, are limited. For example, one who has been employed as a full-time officer for 12 months is presumed to have been acting in that capacity for a significant portion of that period, traditionally, about 2,080 hours/year. Conversely, one who has a reserve officer status for 12 months

might only serve in a police capacity something like two shifts a month (or less), which would be less than 200 hours/year.

15. It is not clear that active duty LEOSA (§926B) exempts, or intends to exempt, Colorado reserve officers from other state laws prohibiting the carrying of concealed firearms. Colorado reserve officers are only dubbed “employees” for the limited scope of workers’ compensation. It is significant that reserve officers serve for limited periods of time, are mandated to serve as a volunteer, and shall serve without compensation. These restrictions run counter to the fundamental concept of employment: committed working hours compensated by pay.

LEOSA Case Law

16. In *People v. Rodriguez* (2006) – the first known case litigating LEOSA privileges – the Court conducted a detailed analysis of whether or not Rodriguez, an elected Pennsylvania constable, was an “employee of a governmental agency” under §926B. Relevant to the *employee* criteria, the Court noted that 1) the office of the constable is mandated in the Pennsylvania State Constitution, 2) constables are elected, sworn law enforcement officers with mandatory training requirements and state powers to make an arrest, 3) despite their lack of government funding, constables are independent employees of the State of Pennsylvania, 4) Constable Rodriguez testified that he has two jobs and that one of those jobs is his full-time employment as a constable, and 5) constables are paid for their services by the District Courts and/or the Comptroller’s office.
17. In *People v. Rodriguez*, the Court relied on Pennsylvania statute with clear implications that when a constable is performing judicial duties – in Rodriguez’s instance, attempting to serve a valid warrant in the State of New York – he is an agent employee and/or representative of the court, district justice or judge assigning the judicial duties to him. The Court found that constables do not have uniforms or municipal vehicles and they use their own private cars. They are not paid a salary as police and sheriffs are, but are more like independent contractors whose pay is on a per job basis. In summary, the Court found that because Rodriguez was recognized in his state as a sworn law enforcement officer who was paid by the government for conducting official government business, he was “an employee of a governmental agency” as that phrase is used in §926B. That analysis, coupled with detailed examination of the other terms defining “qualified law enforcement officer” found in §926B, led the Court to rule that Rodriguez’s prosecution in New York was preempted by LEOSA. (Notably, Rodriguez had with him valid Pennsylvania warrants he was seeking to serve when he was arrested for carrying a concealed firearm in New York.)
18. I reviewed additional case law pertaining to LEOSA, but have not seen the detailed “employee” analysis as undertaken by the Court in *People v. Rodriguez*. Other Courts have ruled on LEOSA in the context of law enforcement officers whose prior full-time employment was undisputed, yet they were denied *retired* LEOSA credentials by their previous employer, or were required by a state government to apply for permits over and against LEOSA’s language. *People v. Rodriguez* is the only case I have discovered where the officer’s qualification for LEOSA protection hinged on his active employment status.

Salamander Identification System

19. "Salamander" is a company providing private and government sectors with physical cards used for employee identification, credentialing, and access permissions. Agencies create online employee profiles that can be used to track qualifications and training. Printed IDs include a QR code so resources can be scanned, identified, and organized during large scale events. The Colorado Department of Public Safety, specifically, the Division of Homeland Security and Emergency Management (DHSEM), approves government agencies for use of the Salamander system within Colorado. Each agency is responsible for its own use of the system, but DHSEM has broad oversight over the program. An agency could, for example, purchase their own printer and issue Salamander IDs to their employees, but they need DHSEM's approval to be officially recognized and integrated into the statewide system. There are third-party vendors of Salamander products/services and Colorado uses Salamander via "Midwest Card and ID Solutions." Like most workplace credentials, IDs printed by the Salamander system are the property of the issuing agency.

20. The most current revision of the Salamander System Base Plan, under the Colorado Identification and Credentialing Program, occurred in 2016. According to that document, prepared by the Colorado DHSEM Logistics Section, government agencies using the Salamander system have the following issued date and expiration date requirements when printing IDs:

Issued Date Requirements
The Issued Date is to be set when the qualifications are verified. If a reprinted card is issued for the same individual it should contain the original issue date. (I.e. use the issue and expiration dates that were included on the original printing of the IDCC.)

Expiration Date Requirements
The expiration date is to be set on the day of printing and shall not exceed five years from the issue date. This timeline follows the Colorado Incident Management Team (IMT) and Emergency Operations Center (EOC) task book approval process. The date can be fewer than five years so that the IDCC expires at the same time as a qualification, such as a license or certification. This does not include cards that have been reprinted when the original was lost, stolen, or damaged. If a reprint card is issued for the same individual, it should contain the original expiration date. At the end of the five-year (or shorter) period, credentials and qualifications should be reviewed and re-vetted. Only then should a new card be printed with a new expiration date.

Summary of Dismissed Case, 2021CR5

21. On 02/26/21, the Prowers County Sheriff's Office in the 15th Judicial District of Colorado was contacted by the Cheyenne County Sheriff's Office (also in the 15th) to follow up on information provided to Cheyenne County by a private security business out of California, Security Industry Specialists (SIS). SIS reported to Cheyenne County that in December of 2020, an SIS employee, ADAM HANNA, submitted a retired LEOSA ID as part of his credentials. According to the ID, HANNA was retired from the Cheyenne County Sheriff's Office with retired LEOSA qualifications, patently allowing him to carry a concealed firearm anywhere in the U.S. Cheyenne County advised SIS

that HANNA was not retired from their agency and their agency had not issued HANNA a retired LEOSA ID. Prowers County learned during their investigation that HANNA was employed as the Cheyenne County Undersheriff for about three months. During that time, his position allowed him administrator access to the online Salamander portal and he was authorized to issue IDs for Cheyenne County employees. His employment as the Undersheriff was from 10/15/19 to 01/31/20. Prowers County obtained logs from the Salamander system showing that HANNA’s admin profile printed 12 total IDs for ADAM HANNA’s user profile, the last of which was printed about a week before HANNA resigned. The final printed ID was given an “issued” date of 02/10/20 (ten days after HANNA resigned) and an “expires” date of 02/10/30. Prowers County obtained a scanned copy of this ID from SIS, who had the copy on file because HANNA provided it to them as part of the employment process. The ID clearly identified HANNA as a “retired” law enforcement officer and made plain assertions that HANNA was credentialed under retired LEOSA, §926C. When interviewed by Prowers County, HANNA denied retaining possession of any Cheyenne County ID cards and claimed he left all IDs with Cheyenne County when he resigned. Prowers County also obtained materials HANNA sent to SIS claiming that he had served as an officer for about seven years – three years shy of retired LEOSA eligibility.

22. As a result of Prowers County’s investigation, HANNA was charged with criminal impersonation, forgery, attempt to influence a public servant, and first degree official misconduct. An arrest warrant was issued on 03/26/21 and the case was filed as Cheyenne County 2021CR5. HANNA entered into a pretrial diversion contract with the 15th J.D. District Attorney’s Office and it was approved by a judge on 01/25/22.

CO POST Compliance Investigation

23. On 03/16/22, as part of his routine duties, POST Compliance Investigator ECKELBERRY reviewed 21CR5 and learned that HANNA, a certified peace officer employed at the time by the Morrison Police Department, was granted diversion for forgery (F5), criminal impersonation (F6), and first degree official misconduct (M2). Each of these offenses affected HANNA’s certification eligibility, as they are all disqualifying offenses. Inv. ECKELBERRY sent HANNA an Order to Show Cause that indicated he was to appear before the POST Director at a scheduled hearing to show cause as to why his certification should not be revoked. Prior to the hearing, Inv. ECKELBERRY reviewed the case report completed by Prowers County and identified that the criminality of the case stemmed from HANNA printing the retired LEOSA ID that he was not eligible or authorized for and later providing it to SIS as a concealed carry credential for private security employment. Inv. ECKELBERRY also reviewed HANNA’s CO POST records and confirmed those records reflected less than 10 aggregate years of law enforcement service.

Show Cause Hearing

24. HANNA appeared at the POST Show Cause Hearing on 05/03/22, accompanied by Morrison Police Department Chief BILL VINELLI. HANNA was wearing a police uniform. The hearing was conducted virtually via Zoom and was recorded. The POST employees who were present were ERIK BOURGERIE, the Director of CO POST; STEVEN ECKELBERRY, the Compliance Investigator for POST; MEGAN DIMPSEY,

the Compliance Coordinator for POST; and CATHERINE RODRIGUEZ, the Compliance Manager for POST. Director BOURGERIE explained that at the conclusion of the hearing, he would consider any information HANNA provided and determine at a later date whether or not HANNA's certification should be revoked. He explained that if he decided it was in the public interest not to revoke, the process ended; however, if he thought it was in the public interest to revoke, he would make that recommendation to the board and they would vote on whether or not to accept his recommendation. He explained that HANNA would have the opportunity to appeal directly to the POST board. Director BOURGERIE explained that if the POST board granted an appeal, they would assemble an appeal subcommittee who would hear from HANNA and if they found it was in the public interest not to revoke, the process ended. However, if they voted to revoke, the matter would again go before the POST board for a final vote. Director BOURGERIE asked HANNA what he wanted to tell him about the incident, the diversion agreement, and why it was in the public interest for HANNA to remain certified.

25. HANNA replied with an uninterrupted, 10 minute narrative that never mentioned the retired LEOSA ID. Instead, he claimed:

- a. A subordinate opened the investigation and lied about HANNA leaving on bad terms because HANNA was hired at a higher rank than him.
- b. There were false statements in the affidavit made by the subordinate.
- c. HANNA wrote in his resignation letter that he was leaving on good terms and would help Cheyenne County with their training.
- d. HANNA is certified in every law enforcement skill.
- e. HANNA wrote in his resignation letter that the Sheriff told him if he ever wanted to come back, he was more than welcome to.
- f. HANNA only left Cheyenne County because he could not live on his Undersheriff salary of \$2300/month.
- g. HANNA was "going to deploy," as he was "accepted on a contract to Somalia as a designated defensive marksman"; however, COVID interrupted that.
- h. HANNA went to Florence PD as a reserve officer while he worked in executive protection (private security), which is how he built his background.
- i. There was an "anonymous" labor board complaint filed against Cheyenne County after HANNA left and HANNA ended up getting "an extra check."
- j. HANNA applied for a part-time job as an off duty officer doing private security.
- k. HANNA "met all of the qualifications" for the security job and he had an "active, valid ID" from Florence PD.
- l. HANNA maintains a PDF document that he scans all of his training and credentials into for easy submission when applying for new positions.
- m. He sent that PDF document to SIS and there was a copy of his "previous Undersheriff ID that (was) no longer active or valid," but it was accompanied by his valid Florence ID.
- n. "Technically, that Sheriff's – uh, Undersheriff ID should not have been in there, and I agree. And I apologize that I did not go through the PDF to delete that file, but it was an active – once active, invalid ID."
- o. When SIS contacted Cheyenne County, Cheyenne County said HANNA should not have that ID because he no longer worked there. HANNA did not have that ID – he had a scan of it – because he turned the physical ID in when he left.
- p. The same subordinate at Cheyenne County received this information and

turned the investigation over to another county who called HANNA. HANNA told the investigator that he turned all of his equipment in to Cheyenne County, leaving it all in his office when he left.

- q. A month later, HANNA received notice that there was a warrant for his arrest. HANNA went to court and rejected plea deals because he didn't think it was right and felt "they were retaliating because of the situation when (he) left."
- r. In about January of 2022, HANNA received a call from his attorney because the Cheyenne County Sheriff had been arrested for domestic violence and the Undersheriff resigned. Those were the only people who were part of HANNA's case, besides him.
- s. HANNA's attorney said a diversion offer was on the table and rather than take a chance with a jury, HANNA took the diversion with the understanding that he could remain in law enforcement.

26. Director BOURGERIE asked HANNA if he had any evidence, aside from the resignation letter that HANNA wrote himself, that he left on good terms. HANNA replied that his exit interview with the Cheyenne County Sheriff was recorded and should be available as evidence that he left on good terms.

27. Director BOURGERIE asked if there was anything else he would like to add. HANNA said he believes he is an asset to his agency because he is a very proactive officer and he has advanced very rapidly in his career. He said, "Um, not being a cop as long as most, I've held the rank of Commander and Assistant Chief of Leadville PD, I've been a detective, um, I've been a K9 officer, department Training Coordinator, uh, eventually Undersheriff of Cheyenne County, and now an officer here at Morrison PD." HANNA added, "I have never received a civilian complaint, out of all of the citations I've ever issued, criminal cases I've worked on, I have never had a complaint against anyone I've arrested. Most of the time, when I take someone to jail, they're actually thanking me, and it's, it's kinda funny. So I think that makes me a very good cop and I think, um, the citizens of Colorado deserve the protection and uh, the abilities and leadership that I have to offer."

28. Director BOURGERIE asked HANNA how he would explain that the Cheyenne County ID that was submitted to SIS had an issued date after HANNA's date of resignation from Cheyenne County. HANNA replied, "I don't know, I haven't seen what they're claiming. Um, all I know is the email that I sent to that agency, which I actually showed Chief VINELLI, um, it did not have a date after my resignation on that ID card." HANNA went on to assert that although he resigned on 02/01/20, he worked about a week longer and his actual departure date may have been closer to 02/07/20.

29. Director BOURGERIE pointed out that the photo of the ID in the casefile is not HANNA's Undersheriff ID, like HANNA claimed, but it's an ID that was issued on 02/10/20, it's labeled as a "retired" ID, and it has a specific reference to 18 USC 926C (LEOSA). Director BOURGERIE asked, "Who made it and why would these discrepancies be on there?" HANNA replied, "To be honest with you sir, I've never seen that ID, so I don't know. The ID that was submitted to the company, which I went through my emails with Deputy Chief VINELLI, when he was Deputy Chief, we pulled all of those forms, and that was not what was on that ID."

30. Inv. ECKLEBERRY shared his screen and showed HANNA the copy of the retired

Cheyenne County LEOSA ID that was provided by SIS to Prowers County as a credential HANNA submitted to SIS. Upon the ID being shown, HANNA immediately noted, skeptically, "That also has a ten year expiration date." Director BOURGERIE pointed out that the State does not allow Salamander IDs to have an expiration date longer than 5 years, and yet this ID had a 10 year expiration. Director BOURGERIE asked HANNA how he explained that. HANNA, looking surprised, replied, "I have no explanation for it, uh, it, it's got a ten year expiration date, so that's not a valid date. It's also, it's my birthdate, it's not the date that I resigned or, I don't even think I was there on February 10th. I think I actually started with Florence PD before that date. Um, and I hadn't been in that system, or there, to do that even at that date." When asked if he had ever accessed the Salamander system, HANNA acknowledged he had accessed the system, stating, "I was able to create all of the agency's IDs because that was my job. But that date, I wasn't even there, so I did not enter that in February 10, 2020." HANNA later added, "And I also don't know where that came from because the email that I sent to that company was my act- well inactive, because it was my former ID of Undersheriff, it was not that one."

31. Director BOURGERIE clarified a final time, "So you're saying, you don't know how that (the retired ID) was created, where it originated from?" HANNA replied, "No, that, that was not issued on February 10th. And I don't know how they even got that, because like I said, when I went back through the PDFs, and I pulled it up, that was not my ID card that was submitted, there was my Undersheriff ID card, was submitted, and like I said, it was invalid, so it probably could've just been thrown away, and then I had my active valid one supporting my application, which is all they needed, um, and I'm not sure, I, I have no clue, in, in all honesty, of how they got that because Deputy Chief and myself had pulled up the PDF and looked at it, because I went back through my emails to that company and with the email with my resume it, it did have my Undersheriff ID in it, and I am faulted for that, they shouldn't have gotten that, but I did not have that ID, which I also explained to the Prowers County's Undersheriff that all, everything I had belonging to Cheyenne County, was returned to Cheyenne County, including the actual physical ID, which that was a scanned PDF copy."
32. Director BOURGERIE asked Chief VINELLI if he had anything he wanted to add. During Chief VINELLI's comments, he stated, in part, "...he [HANNA] used to volunteer as a reserve in Florence at a week at a time, um, you know free of charge basically, and we, we never, never once had a complaint regarding all the stops, all the criminal cases, um, domestics..."
33. Inv. ECKELBERRY asked HANNA why the Salamander log showed that he updated the ID issued date and expiration date, along with re-printing the ID several times. HANNA said he did not recall why, but that he "probably did" and he probably printed "a hundred" IDs to troubleshoot the printer. When pressed on when exactly he made those changes and reprinted the ID, HANNA stated, "I don't even think I made a copy in 2020. And I don't recall, nor do I know why I would have. To be honest with you, I don't think there's a reason for me to." HANNA stated that he also never saw a copy of the Salamander printing log, which was included in the casefile.
34. When asked about his Salamander administrator login, HANNA said the only people who were admin users were him and "the dispatcher," but they had different logins. He said he left his login as "auto sign-in" on that computer in case "they" needed to login

and print a new employee ID while he wasn't there. HANNA said any IDs that were made were made under camera and the dispatcher assisted him.

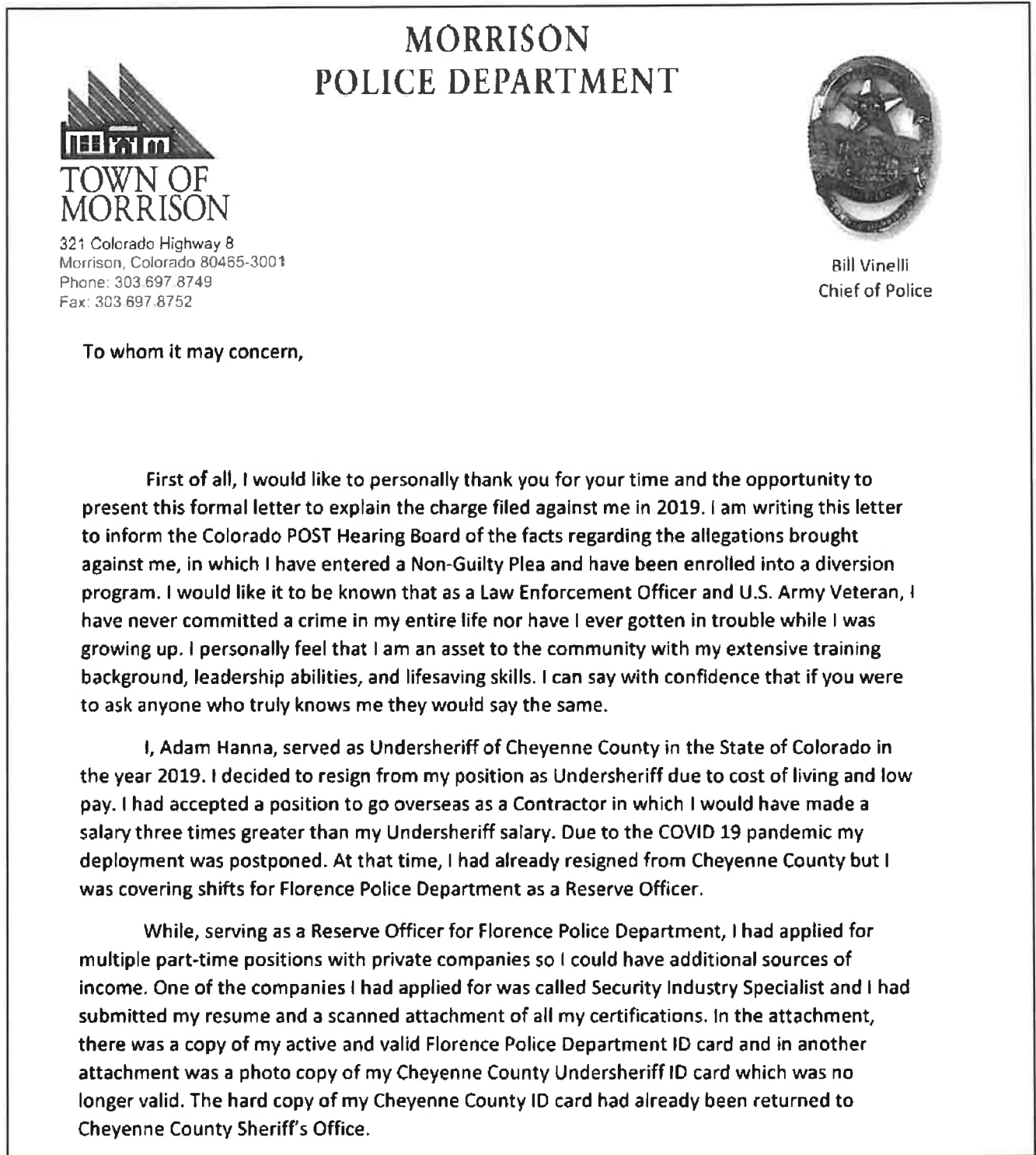
35. At the conclusion of the hearing, HANNA said, "Um, I hope you allow me to still serve the citizens of Colorado, um, I've loved my career in law enforcement, it's, it's a passion of mine which is why even whenever I have been able to make money and do things elsewhere, I, I stayed and volunteered my time to continue to serve the community. Um, I, I do have letters of accommodation (sic) from previous agencies I've been with for actions that I've taken on calls, um, I've been through a number of critical incidents, and I have, I, I have letters of, um gratitude from citizens that I have helped, uh that's really my only purpose for being in law enforcement and it's a passion, um I don't do it for the money, we don't get paid very well, and I have other streams of income now that I have setup for myself, um, I do it because I love helping people, um...like I said, whenever this whole came to fruitio- this whole thing came to fruition, um I personally thought it was kinda outlandish because I had an active valid ID, I, I had no need for what they were claiming I was trying to do, um, plus I met the other qualifications without it, so uh, yeah I, I wish it never happened and I wish I knew why or how, um I, I take full responsibility for sending the Sheriff's Office ID in the first place, because I should've went through the PDF, um, but at the same time, I'm going to be 100% honest, I have sent other former IDs in those same PDFs, um, I didn't know it was a crime, it was an active, valid ID at one point, I wasn't claiming to be anyone I wasn't, I had served as Undersheriff of Cheyenne County and it was active – that retired thing, I don't know, that, that makes no sense, plus a ten year expiration date wouldn't be valid anyway, um – but on the other hand like I was saying, I have submitted former IDs to agencies when I applied for other positions, um, that like I said, had been active and valid at one time, I've never claimed to be someone I wasn't and I wasn't doing it to try to gain anything, um and I think that's one of the things they were harping on is that I was doing it to gain something, uh, I literally applied for a part-time job, um. So to gain me part time income if I would've worked for it? Uh, I, I don't know..."

36. As evidenced above, HANNA made repeated, clear assertions that he never printed a retired ID with LEOSA credentials and what he sent to SIS via email was a scanned copy of the Undersheriff ID that he was issued while employed with Cheyenne County, but that he left in his office upon his resignation. HANNA's statements reveal his understanding that the dismissed case was not about him emailing a scan of a supposed former ID; rather that he created a retired LEOSA ID that he used as a concealed carry credential for private security employment. HANNA's familiarity with LEOSA statutes is obvious. He argued several times that he would not have needed the retired ID since he had an "active" reserve officer ID. As previously documented, it is a strained argument that a volunteer reserve officer is covered by active duty LEOSA. HANNA nonetheless asserted that reasoning as evidence that he lacked the intent to create a retired LEOSA ID.

Appeal Request

37. On 08/01/22, Director BOURGERIE sent HANNA notice that he was recommending revocation of HANNA's certification at the POST board meeting in Grand Junction, CO, on 09/09/22. HANNA contacted Inv. ECKELBERRY to appeal and he also

resubmitted to POST a previous letter he wrote on Morrison Police Department letterhead. Screenshots of the letter are included below:





321 Colorado Highway 8
Morrison, Colorado 80465-3001
Phone: 303.697.8749
Fax: 303.697.8752

MORRISON POLICE DEPARTMENT



Bill Vinelli
Chief of Police

I had left Cheyenne County on good terms and was told by the Sheriff that if I ever wanted to return to the county he would be glad to have me. Cheyenne County did have to pay me due to a labor board complaint that had been received but it was for money that was owed to me for the number of hours I had been covering while employed as Undersheriff, which I was not expecting as the complaint was in regards to Deputies pay. I personally believe that this may have caused some retaliation in the agency against me so when the copy called to validate the ID, it was stated that I shouldn't have been in possession of it, which I wasn't. I met all of the required qualifications for the position in which I applied and I possessed an active valid ID through the City of Florence so there wasn't even a need for Cheyenne County's ID card which had been accidentally submitted.

In conclusion, I have always worked in law enforcement to help others and I have always given 100% which is why I have rapidly advanced in my career working my way all the way to Commander and Assistant Chief. I have never had any complaints against me from the public and have always treated everyone with respect and courtesy. I feel that it would be a mistake to revoke my POST certification as I am an asset to my agency and the citizens of Colorado.

Respectfully,

Adam C. Hanna

(307)871-5619

POST Board Meeting in Grand Junction

38. As a matter of public record, POST board meeting minutes are made public. The below screenshot is from the record of proceedings from the 09/09/22 meeting:

PHIL WEISER
Attorney General
NATALIE HANLON LEH
Chief Deputy Attorney General
ERIC R. OLSON
Solicitor General
ERIC T. MEYER
Chief Operating Officer



RALPH L. CARR
COLORADO JUDICIAL CENTER
1300 Broadway, 10th Floor
Denver, Colorado 80203
Phone (720) 508-6000
Peace Officer Standards and
Training

**STATE OF COLORADO
DEPARTMENT OF LAW**

**POST BOARD MEETING
RECORD OF PROCEEDINGS
Friday, September 9, 2022
10 A.M. – 12 P.M.**

The Peace Officer Standards and Training Board held its 418th Board meeting at the Hampton Inn 205 Main Street. Grand Junction. CO 81501.

39. The board meeting was held at the Hampton Inn, 205 Main St, Grand Junction, CO, on 09/09/22. The meeting was recorded. The 19 POST board members and 10 staff members who were present are documented below:

BOARD MEMBERS PRESENT

DONALD ADDY, Public Member
SENIOR INVESTIGATOR TONYA BARNES, Eighteenth Judicial District
DEPUTY DA ASHLEY BECK, Public Member
CHIEF GREGORY DALY, Avon Police Department
LAURA DANIELS, Public Member
CHIEF GEORGE DINGFELDER, Monte Vista Police Department
OFFICER RACHEL ESTERS, City of Ouray
CHIEF DEBRA FUNSTON, Rifle Police Department
EXECUTIVE DIRECTOR STAN HILKEY, Colorado Department of Public Safety
SCOTT LEVIN, Public Member
DEPUTY SHANNON LOFLAND, Arapahoe County Sheriff's Office
SHERIFF DAVID MARTIN, Morgan County
SHERIFF ANTHONY MAZZOLA, Rio Blanco County Sheriff's Office
SHERIFF SHAWN MOBLEY, Otero County Sheriff's Office
SHERIFF STEVE NOWLIN, Montezuma County Sheriff's Office
SHERIFF ANTHONY SPURLOCK, Douglas County Sheriff's Office
CHIEF JEFFREY SWOBODA, Fort Collins Police Services
ATTORNEY GENERAL PHIL WEISER, Colorado Department of Law
COUNCILMEMBER WAYNE WILLIAMS, City of Colorado Springs

POST STAFF MEMBERS PRESENT

ERIK BOURGERIE, Director
JANET DRAKE, Deputy Attorney General, Criminal Justice Section
STEVEN ECKELBERRY, Compliance Investigator
VICTORIA EDSTEDT, Administrative Coordinator
KISHAWN LEUTHAUSER, Reginal Grant Coordinator
MARIO NORIEGA, Administrative Coordinator
DAN OSTRANDER, Training Specialist
CATHERINE RODRIGUEZ, Compliance Manager
JARED TORSNEY, Training Specialist
MARY VEKASY, Compliance Specialist

40. HANNA and Chief VINELLI were also present in person:

MEMBERS OF THE PUBLIC IN ATTENDANCE

PAUL GREGORY. Chair of Firearms SME Committee
 JANET LARSON. Chair of Curriculum SME Committee
 ADAM HANNA. Morrison Police Department
 BILL VINELLI. Chief of Morrison Police Department
 COMMANDER KARL SMALLEY. Chair of Driving SME Committee
 SERGEANT KEVIN SMYTH. Arrest Control Tactics SME Committee.
 TYKO COSTANDINE. Present for Hearing
 NADINE COSTANDINE. Public Member
 LAURA MACKENZIE. Public Member

41. According to the meeting minutes and the recording, HANNA made a request to the board for an appeal of the show cause hearing recommendation of Director BOURGERIE. During his request, HANNA continued to deny that he created the retired LEOSA ID, or that he had ever seen it. He also claimed that he had 10 years of service in law enforcement and would thus qualify for a retired LEOSA ID. Some of HANNA’s statements are included below:

- Colorado Attorney General WEISER: “...was it a fake ID that you were accused of creating using official resources?”
 - HANNA: “Um, so I had submitted an application with a packet of credentials and in that packet of credential was an ID for Undersheriff which I was no longer valid or good, um, I had also submitted my active valid credentials with the Florence Police Department which did have good standing at that time, um, and then they said that they were not valid credentials, um, which they said that I would also not qualify with the job for the Undersheriff credentials, which I did meet all the qualifications, I was hired by that company, also was not mentioned, um, I hired and worked for that company until I resigned because of everything that was going on. Um, also, another reason for acceptance of the diversion program was because of COVID and the way the judge’s schedule aligned, I would just now be having my trial on that, so almost a year later I would have not been able to work while pending this trial and they, they advised that if I took the diversion program, which would have no effect on my POST, failed to me that that was completely inaccurate, that I was able to go back to work instantly, um I had a letter from my attorney, I had a letter from the District Attorney’s Office, um which are accompanied in the packet that I put together for y’all, stating that I was not accepting a plea of guilt by any means, and that I still had my right to trial if I so choose.”
 - A.G. WEISER: “To ask the question a little more pointedly, um in the letter that Bo [Director BOURGERIE] did, it talks about this credential as one that would have been created using the official system, that would have been for a ten year period when the normal time would have been three years, is your position you didn’t create this [ID card]?”
 - HANNA: “My position even to this day is I still have yet to be presented this credential that has been claimed in my case. Um, from my attorney,

from the courts, from anyone. Um, and now the case is dismissed, and I still have yet to see the credentials that have been claimed.”

- Sheriff MARTIN: “One of these cards is a LEOSA card, uh a concealed handgun permit often given to retirees with 10 years of law enforcement experience or more, cumulative. Do you have 10 years of law enforcement experience, cumulative?”
 - **HANNA**: “I do.”
 - Sheriff MARTIN: “And did you qualify for that LEOSA card?”
 - **HANNA**: “I would have, yes.”
 - Sheriff MARTIN: “I didn’t ask you if you would have, who issued you the LEOSA card?”
 - **HANNA**: “I haven’t seen the LEOSA card is what I’m stating.”
 - Sheriff MARTIN: “You submitted that card as an application...”
 - **HANNA**: “That’s correct, that’s what I was told.”
 - Sheriff MARTIN: “Did you not submit that card?”
 - **HANNA**: “I did not, I submitted a copy of my old Undersheriff’s ID card, which had the concealed carry credentials on the back of it, that is correct. And I still to this date have not seen this retired Undersheriff’s ID card that I was charged with. My attorney has not presented it to me, nor has anyone else.”

42. Executive Director HILKEY then expressed confusion over whether or not HANNA was denying that he created an ID card. Executive Director HILKEY expressed his understanding there were discrepancies about an ID card and opined whether the case dismissal was due to a lack of evidence, or due to HANNA having completed the diversion program. A.G. WEISER intervened to clarify:

- A.G. WEISER: “But the reason it was dismissed was because you did the diversion program, is that correct?”
 - **HANNA**: “Correct. Dismissed with prejudice.”
 - A.G. WEISER: “The point that Director HILKEY raised is a good one – are you saying you never created a card that you wouldn’t have been issued – you didn’t create the card yourself?”
 - **HANNA**: “Correct. So, I, whenever they brought the case to me, they said, ‘Mr. HANNA in our documentation, you’ve shown to have made like 50 cards’... [HANNA goes on for several minutes regarding: making lots of ID cards with a dispatcher, trying to get them to print correctly, and turning everything back into Cheyenne County when he left]... I have not been presented with this fraudulent card, I don’t have this fraudulent card...It was told to me now that, that it was a, uh retired ID card, which I don’t have in my possession. Um, I’m assuming it’s a scanned copy, because everything else sent to them was a scanned photocopy, but nothing was ever presented to me in court, my attorney still hasn’t presented it to me. No one’s presented this retired ID card to me for the creation of it. But there was like 50 cards created that day.”
 - A.G. WEISER: “50? Were any of them created for you?”
 - **HANNA**: “Um, we were using my name, yes. They, they weren’t specifically for me, like they were all shredded and thrown into the trash compactor, but we were using me as the guinea pig on it, yes.”

- Chief DINGFELDER: “What I’m struggling with is the fact that this card was emailed to the security company from your email – it was from your email address, correct?”
 - **HANNA**: “So the credential packet was from my email correct, the card they have I’m not aware of.”
 - Chief DINGFELDER: “That credential packet included the Salamander card?”
 - **HANNA**: “Correct, it included all of my credentials.”

43. A female in the group clarified that two issues were being discussed thus far, 1) the ID and 2) HANNA taking a diversion without seeing the evidence against him under legal advice that it would not affect his POST certification. A.G. WEISER clarified that the law was clear on the matter – if you take a diversion for a felony, you are disqualified from being POST certified. A.G. WEISER added:

- A.G. WEISER: “There’s a second point too, that is a little beneath the surface, particularly from the Chief [VINELLI] that something about this case you think might just be manufactured, is that a fair way to...”
 - **HANNA**: “Correct.”
 - A.G. WEISER: “Okay, which is a serious claim about the D.A.’s Office pursuing such a case...”

44. D.D.A. BECK then clarified that there are several types of diversion: in one scenario the defendant pleads guilty, but their sentence is deferred if they meet the requirements, but in a pretrial diversion there is no admission of guilt. D.D.A. BECK expressed that she comprehends HANNA’s confusion if he received legal advice that this diversion would not affect his certification. D.D.A. BECK continued:

- D.D.A. BECK: “So when you did this, did you not review the discovery in the case... did you have an opportunity to review...”
 - **HANNA**: “I have. So whenever I got the discovery, I had a letter from my predecessor as Undersheriff who was my Sergeant underneath me who we didn’t see eye-to-eye because I got hired from an outside agency above him, um, he had written a letter that said that I left the agency on bad terms and all of the stuff that was not factual information. There is no disciplinary action forms or anything negative about me leaving that office other than the fact that the office end up having to pay me after I had separated because there was an, um anonymous complaint filed against the agency for paying deputies improperly...”
 - D.D.A. BECK (interrupting): “Redirecting, so you keep saying you’ve never seen this card, which appears to be...”
 - **HANNA** (interrupting): “Correct.”
 - D.D.A. BECK: “...the basis for these charges...”
 - **HANNA** (interrupting): “Correct. I have not.”
 - D.D.A. BECK: “...someone is alleging that a card was photocopied, sent from your email, and provided to another agency...”
 - **HANNA** (interrupting): “Correct.”
 - D.D.A. BECK: “...right, that’s the crux of our case, and so, but you’re saying that in the discovery that you were provided, you did not see

- whatever photocopy...”
- HANNA (interrupting): “That is correct.”
- D.D.A. BECK: “...whatever card. Was that addressed with the DA at all?”
- HANNA: “Um...”
- D.D.A. BECK (interrupting): “Did your counsel say, ‘You don’t have a basis for charges?’”
- HANNA: “I – I do not know if they have. It was, yes.”

45. At the conclusion of HANNA’s statements, board member Sheriff NOWLIN made a motion to grant HANNA an appeal hearing and board member Executive Director HILKEY seconded the motion. The motion was approved by a majority vote of the board and a subcommittee for the appeal hearing was formed consisting of Senior Investigator TONYA BARNES, Chief JEFFREY SWOBODA, Sheriff DAVID MARTIN, Sheriff STEVE NOWLIN, and D.D.A. ASHLEY BECK.

POST Compliance Follow Up

46. Based on HANNA’s claims to the POST board that he had never been presented with a copy of the retired LEOSA ID, Inv. ECKELBERRY contacted the District Attorney’s Office in the 15th J.D. Inv. ECKELBERRY received a copy of the discovery packet in 21CR5 from D.A. Investigator RIDDER. The packet contained a copy of the retired LEOSA ID that was provided by SIS as one of HANNA’s application credentials. This was the same copy Inv. ECKELBERRY showed to HANNA during the show cause hearing. Inv. ECKELBERRY followed up with Inv. RIDDER and obtained the specific timestamps when HANNA’s attorney was provided the same discovery packet. Inv. RIDDER advised that according to the timestamps in “Action” (the statewide database used by CO District Attorneys), discovery in 21CR5 was created on 04/06/21 and was downloaded by HANNA’s attorney on 04/11/21, at 1552 hours. HANNA did not enter into the diversion contract until January of 2022.

47. Inv. ECKELBERRY also completed preliminary follow up regarding HANNA’s years of law enforcement service by checking the CO POST Benchmark records management system. Benchmark is used by CO POST to track employment and training records of all certified peace officers in the state. Inv. ECKELBERRY found that HANNA had less than 10 years of law enforcement experience documented in Benchmark.

Appeal Subcommittee Hearing

48. The appeal hearing took place virtually on 10/07/22 and it was recorded. Director BOURGERIE, Compliance Manager RODRIGUEZ, and Inv. ECKELBERRY attended, along with the subcommittee of POST board members previously mentioned. HANNA was represented by an attorney who opened up by speaking on his behalf. Chief VINELLI was also present, in uniform. In summary, HANNA’s attorney claimed that she believed HANNA received poor legal advice that a diversion would not affect his certification. She claimed this advice came from his defense counsel, as well as the D.A.’s Office, and she referenced materials that had previously been provided to POST. She did not mention the retired LEOSA ID.

49. HANNA appeared in a Morrison Police Department, Class A police uniform with three bars (“hash marks”) on his left sleeve. Bars on the left sleeve of a law enforcement

uniform most commonly refer to five years of service per bar, but depending on the agency, may also signify three or four years of service per bar. On the Morrison Police Department's website, Chief VINELLI is pictured with six bars on his Class A uniform and his bio reads that he has 32 years of law enforcement experience, consistent with each bar representing five years. The bars on HANNA's Morrison PD uniform would therefore convey at least 15 years of law enforcement service. See below screenshots:

Home » Government » Departments » Police » Administration & Records » Chief's Message

Chief's Message

My name is Bill Vinelli, and I am proud to be the Chief of Police for the Town of Morrison. I have 32 years of diverse Law Enforcement experience, and look forward to being the Chief for many years to come.


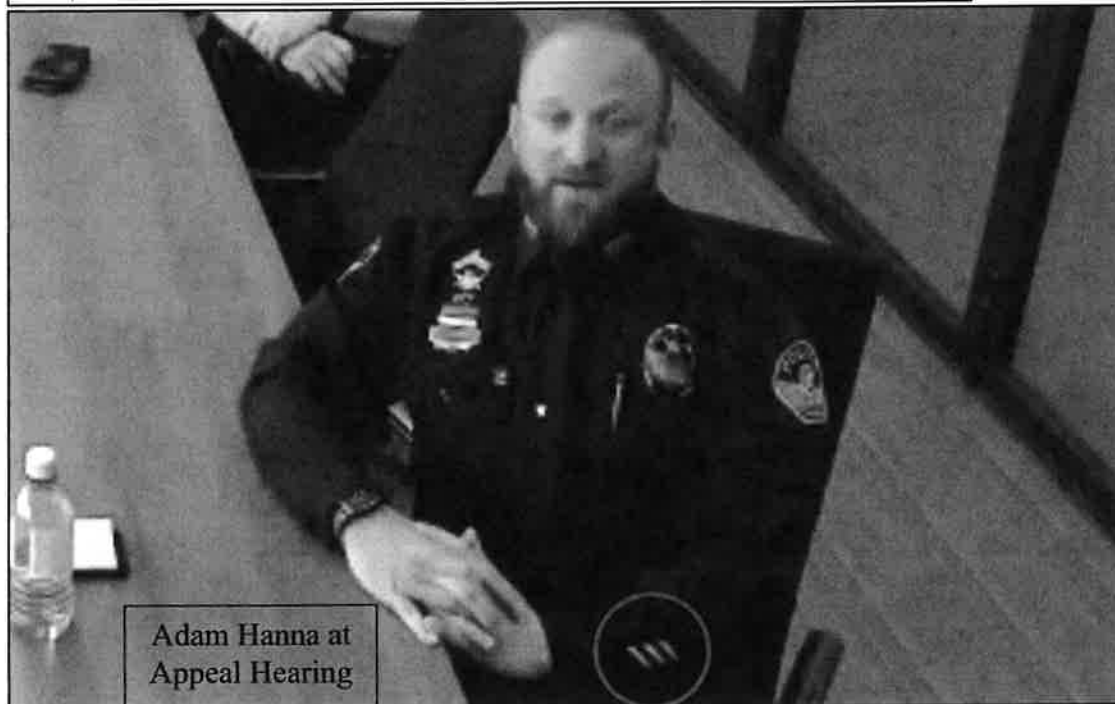
Thank you for visiting the Morrison Police Department's website. I invite you to take a moment to explore our website and see for yourself what our Department has to offer community members and visitors of Morrison.

Our Department is comprised of dedicated individuals providing excellence in police services. We strive to deliver these services with care and consideration. We are committed to providing law enforcement services that provides a culture of inclusion and promotes equity in our community.

These values are practiced within our Department as well. Through regulatory self-checks, we examine our operations and look for ways we can improve. At Morrison Police Department, we are accountable to each other and our community.

We are proud of our community and our Police Department. We endeavor to enhance the quality of life for all who reside in and visit Morrison. We also work to provide a safe place that is welcoming of all.

Our commitment to serve and protect through community-centered policing and partnerships help make Morrison a better place.

50. After his attorney spoke, HANNA spoke for about 10 minutes. He said he enlisted in the U.S. Army and received a Top Secret security clearance. He did not mention any Military Police experience. He said he first became a law enforcement firearms instructor in 2012. He said, "I was a reserve officer at Florence Police Department where I probably volunteered over 1000 hours. Um, on a monthly basis, I would give one to two weeks of time strictly volunteering as a reserve officer and giving them those hours. Um, never once did I get paid for it. Actually, jokingly, um you know those people in the public who go, 'Hey, I, I, I pay your salary, you, you can't do this, or you're messing with me,' um, there was quite a few of them and I go, 'No, you actually don't pay my salary, I do this for free.'" While HANNA continued to talk about himself, the subcommittee chair cut him off and said they only had 20 minutes left and the committee had to get to questions.
51. Sheriff NOWLIN confirmed with HANNA that he was charged with two felonies and a misdemeanor and he entered into a pretrial diversion agreement; HANNA agreed.
52. D.D.A. BECK noted that HANNA made several claims that he received a letter from the D.A.'s Office stating that the diversion would not affect his certification. D.D.A. BECK said she was "troubled" by that claim because the "letter" HANNA provided was from a D.A. Investigator and it specifically stated, "As for what guidelines the POST Board considers, I cannot say..." The letter went on to suggest that HANNA check the POST website. D.D.A. BECK pointed out this meant the D.A. and the investigator who authored the letter did not know, so while HANNA may have received certain legal advice from his defense counsel, D.D.A. BECK did not see anything in the materials to justify HANNA's "blanket statement" that "everyone" told him his certification was safe. HANNA replied with another lengthy answer ultimately agreeing that the letter (an email) D.D.A. BECK was referencing was regarding HANNA working as an officer at Morrison PD while on a diversion contract and was not legal advice from the D.A.'s Office. HANNA reiterated that he accepted the diversion on the advice of counsel.
53. D.D.A. BECK asked HANNA if he himself reached out to POST to verify what he claimed his attorney advised him. HANNA replied that he spent hours online researching the POST website and "Google" and he eventually found a POST training video that stated a diversion in his circumstances would cause a revocation, but that it was too late because he already accepted the diversion by the time he saw it.
54. D.D.A. BECK then addressed HANNA's claims that he had never seen a copy of the ID that he allegedly submitted to SIS as part of an employment application. D.D.A. BECK said she had a copy of the discovery and she could "see plain as day that there is a photocopy of the credential that is at issue here." She continued, "So is it your contention that that was not in the discovery that you received, even though it is documented as being discovered to you and your counsel?"
- **HANNA:** "I, I have yet to see that document."
 - D.D.A. BECK: "Did you also attend a show cause hearing with POST staff and Director BOURGERIE, and is it your testimony, I guess, today that you did not see, and you were not confronted with a photocopy of this badge during that hearing?"
 - **HANNA:** "We didn't see, no, I have not, they didn't, I didn't see it at that hearing. Um, I was questioned about it at the hearing, and I don't recall seeing it at the hearing. I recall saying that I didn't see it still at that

hearing as well.”

55. HANNA then asked the POST employees if he was shown the credential at the show cause hearing, stating he didn’t recall seeing it. Inv. ECKELBERRY started retrieving the recording of the show cause hearing to show it to HANNA.

56. While that was occurring, Sheriff MARTIN said: “In September, at our meeting in, uh Grand Junction, I asked you at that time if you knew the requirements for a LEOSA card. And you told me you did. And I asked you at that time if you qualified under the guidelines for LEOSA.”

- **HANNA:** “Yes, Sheriff.”
- Sheriff MARTIN: “And you told me that you did.”
- **HANNA:** “Yes, Sheriff.”
- Sheriff MARTIN: “How do you qualify where you don’t even have 10 years cumulative law enforcement experience for that card?”
- **HANNA:** “I, I do have 10 years cumulative law enforcement. I have, since 2014, even on the POST website. And then I have 2 years outside of Colorado as well.”
- Sheriff MARTIN: “But your law enforcement career started in 2014, is that correct?”
- **HANNA:** “That is not correct, it started before then.”
- Sheriff MARTIN: “When did it start?”
- **HANNA:** “Uh, I’ve been, so I got certified as a law enforcement firearms instructor in 2011. Um, I would say 2010 I would have been certified with NOPD as a special officer. And that would have started it, so we’re actually looking at almost 13 years of cumulative experience, well 12 years, we’re in 2022 still.”
- Director BOURGERIE: “Isn’t New Orleans Special Police – aren’t those security? Do you have arrest authority?”
- **HANNA:** “So, it is not sworn law enforcement that is correct. Um, we are, it is a security-style position. Um, we would do parking infractions, we’d do um, crowd control, things along those lines, that was the start of my career, that’s correct.”

57. Inv. ECKELBERRY had the recording of the show cause hearing queued up and he played the relevant portion of HANNA being shown the retired LEOSA ID. While watching the recording (of him looking at the ID), HANNA again commented that the issued date on the ID was his birthdate (February 10th).

58. After watching the recording of HANNA being shown the copy of the retired LEOSA ID during the show cause hearing, members of the subcommittee hearing had additional dialogue with HANNA, portions of which are included below:

- Inv. BARNES: “It sounds like you had knowledge that it was included in your application to the security company.”
 - **HANNA:** “That is not accurate ma’am. What I stated in that situation was that I submit – so I scan in my credentials. Every time I get a new credential, I scan it in. So that way when I apply for an agency or I send out an application, I can send everything all at once. And in that, which also would have gone to Florence Police Department, would have been

- my Undersheriff credential. However, when I applied for that, I was already working at Florence PD. So, I would have submitted an active valid credential with Florence PD. That would have been no longer active or valid. That specific ID is not the one that I was referring to as I hadn't seen that one up until the POST board hearing whenever they showed it to me."
- Inv. BARNES: "The security company also said that you – that ID was from Cheyenne County Undersheriff, was submitted to them in your application package."
 - **HANNA**: "I went through, and I pulled all of the emails that I had sent to them, from my phone, and reviewed the attachments. And that ID was not attached in those emails. I don't have that ID, I've never had a physical ID that said 'Retired Undersheriff,' I had my Undersheriff ID card which was left in my office with my badge, and all my belongings, on top of my file cabinet."
 - Inv. BARNES: "So I guess the question is, that's the discrepancy? You never saw it and you never had it, but somehow it ended up going over to the security company that you applied for?"
 - **HANNA**: "That's correct."
- Chief SWOBODA: "It's been said multiple times, even at the beginning of this, that you've never seen that ID – do you see now that that's almost impossible to believe because we've got a video of you seeing it whenever that date was, do you see now that that is not a truthful statement?"
 - **HANNA**: "As the physical ID card, Chief."
 - Chief SWOBODA: "So now you're saying you didn't physically have the one, but you've seen copies of it or video of you being presented with it on the screen."
 - **HANNA**: "And that was, that hearing was the first time that I seen the copy of it."
 - Chief SWOBODA: "Okay, but so at the beginning of this, you've seen the ID. Can we all agree that you've seen the ID now, or are you still saying you've never seen the ID to this day?"
 - **HANNA**: "Correct, I've seen the copy of it on that, in that hearing."
 - Chief SWOBODA: "Okay, so did you forget that that happened, or are you parsing words that you saw a video of it and you've never physically held it in your hands? Are you parsing words or are you forgetting that you actually did see it and that was a not-factual statement earlier in this meeting?"
 - **HANNA**: "So, I've never seen this physical ID card, that is correct"
 - Chief SWOBODA: "No but did – do you call that as seeing it, or not?"
 - **HANNA**: "That's seeing a photo of a scanned copy of an ID card, that's correct."
 - Chief SWOBODA: "Okay, gotcha, I've heard enough, thank you."
 - Sheriff MARTIN told HANNA that based upon the discovery documentation, there was a log that appeared to show he had printed several ID cards; he asked HANNA if that was accurate.
 - **HANNA**: "If it's on there, it would be accurate."
 - Sheriff MARTIN: "Okay, so who would benefit from this LEOSA card,

- anybody other than you?”
 - **HANNA:** “No.”
 - Sheriff **MARTIN:** “No one would?”
 - **HANNA:** “No one would benefit with the LEOSA card, other than me. But I wouldn’t even benefit with a LEOSA card.”
- Sheriff **MARTIN** pointed out that according to the discovery documents, **HANNA** repeatedly applied for past security positions (with SIS) that required concealed carry credentials and since he did not meet those requirements, they did not hire him. However, in 2020, **HANNA** submitted a credential that stated he was LEOSA certified which made him look qualified for that job.
 - **HANNA:** “Sheriff, that’s actually incorrect, um, I’ve applied for sales positions with that, with that company, um, whenever they have a job posting, I just click on ‘apply’ via LinkedIn, um, however, I was also qualified for that position with or without that ID card that is being presented.”
 - Sheriff **MARTIN:** “But in your application, it was written in there that you were LEOSA qualified.”
 - **HANNA:** “Yeah, LEOSA could have been active law enforcement, and I was active law enforcement, I was employed with Florence Police department. Or, I was employed at the Sheriff’s Office, so I was active law enforcement. Active law enforcement qualifies for LEOSA...LEOSA isn’t just for retired law enforcement, it, it’s for any law enforcement, um to carry [a firearm] throughout the United States, um for their protection for the bill that was passed years ago, so it’s active or retired law enforcement to qualify for that, as well as military, is also included in LEOSA.”

59. There were no additional questions from the panel and Sheriff **MARTIN** advised the panel that as Chair, he would entertain any motion. Sheriff **NOWLIN** made a motion to the committee that **HANNA**’s certification be revoked. Inv. **BARNES** seconded the motion. The panel voted to uphold Director **BOURGERIE**’s recommendation that **HANNA**’s certification be revoked and the hearing concluded. **HANNA**’s certification was officially revoked at the next **POST** board meeting, which occurred on 12/02/22.

POST Requests Criminal Investigation

60. On 01/25/23, Director **BOURGERIE** requested the 21st D.A.’s Office investigate **HANNA**’s actions during the three meetings he had with **POST** regarding his certification. Director **BOURGERIE** explained that he believed **HANNA** was intentionally deceptive with him, his staff, and the **POST** board in order to try to influence their decisions about whether or not to revoke his certification. Director **BOURGERIE** stated that since **POST** board members and employees are potential victims, they were requesting an outside agency conduct the investigation. I was assigned the investigation and was provided recordings from the three meetings, the original Prowers County case materials, discovery packet, reports, and various records **POST** maintains regarding **HANNA**’s certification and training as a Colorado peace officer.

Hanna’s Law Enforcement Experience

- 61. Each state has regulatory authority over law enforcement officers within their state. Using a national law enforcement database, I located historical address information for HANNA. According to the database, HANNA appears to have had meaningful residency in the following states: Louisiana, Texas, California, Colorado, and Wyoming. HANNA also had residency at Fort Huachuca, a U.S. Army base in Arizona.
- 62. In Louisiana, regulation and certification of law enforcement officers is managed by the LA Commission on Law Enforcement (LCLE). BOB WERTZ, a Law Enforcement Training Manager with LCLE, confirmed that HANNA is not, and has never been, a certified peace officer in LA.
- 63. In Texas, regulation and certification of law enforcement officers is managed by the Texas Commission on Law Enforcement (TCOLE). An open records request submitted to TCOLE confirmed that HANNA is not, and has never been, a certified peace officer in TX.
- 64. In California, regulation and certification of law enforcement officers is managed by the Commission on Peace Officer Standards and Training. TAYLOR ARNOLD, an analyst in the Certification Bureau of the Commission on POST, confirmed that HANNA is not, and has never been, a certified peace officer in CA.
- 65. The U.S. Army Military Police Corps is the law enforcement branch of the U.S. Army. Military Police are trained at Fort Leonard Wood in Missouri. I obtained a copy of HANNA’s certificate of release or discharge from active duty (DD-214) which shows that he enlisted in the U.S. Army Reserve on 11/13/07, about 9 months after his 18th birthday. He attended basic combat training (BCT) at Fort Leonard Wood. He attended Advanced Individual Training (AIT) at Fort Huachuca, AZ. He is credited with 19 weeks of military education (AIT) to become an Intelligence Analyst (IA) and a total of 8 months and 4 days of active military service. He is credited with “00 [zero] YRS 00 [zero] MOS” as an Intelligence Analyst. He was honorably discharged at the rank of Private First Class on 11/12/15. Special Agent PATRONE with the Department of the Army Criminal Investigation Division explained that apart from attending BCT/AIT, HANNA was an Army reserve for 8 years and was never employed as an IA; he therefore has zero time credited working as an analyst. Additionally, Agent PATRONE confirmed that there is no record of HANNA having Military Police training or experience.
- 66. CO POST Director BOURGERIE provided documents showing that on 07/21/14, HANNA applied for his CO peace officer certification, representing that he would meet the criteria for certification on 08/01/14, the date he was scheduled to complete his POST-approved basic training academy. POST provided records showing that HANNA did complete a basic academy and met all POST requirements to be certified.
- 67. On the POST application, HANNA asserted that he had not been certified as a peace officer in another state. The application was signed and notarized under penalties of perjury, see screenshot below:

1. I have successfully completed or will complete on 08-01-2014 a POST approved basic training academy. (Attach copy of academy certificate of completion.)

2. I possess a high school diploma or its equivalent. (Attach copy of diploma or certificate.)

3. I possess current first aid and CPR certification. (Attach copies showing front and back of each card.)

4. My fingerprints were submitted on a POST fingerprint card to the Colorado Bureau of Investigation.

5. I have not been convicted of any felony or any misdemeanor as referenced in § 24-31-305(1.5), C.R.S.

6. I am not under investigation or pending investigation for any felony or any misdemeanor as referenced in § 24-31-380(T.5), C.R.S.

7. I have I have not been certified as a peace officer in another state(s). State(s): _____

8. I have I have not served in the U.S. Military and have not been released or discharged under dishonorable conditions. (Attach copy of DD-214 Showing Character of Service.)

9. I am a United States citizen or legal permanent resident who is lawfully present in the United States pursuant to Federal Law and § 24-76.5-103, C.R.S.

10. I possess a valid driver's license or a Colorado Identification card or a United States military card. (Attach copy)

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS AFFIDAVIT AND ACCOMPANYING DOCUMENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, THEY ARE TRUE, CORRECT, AND COMPLETE. I FURTHER ACKNOWLEDGE THAT ANY FALSE STATEMENT, MISSTATEMENT, OR INACCURACY MAY RESULT IN REVOCATION OF MY CERTIFICATION, AS WELL AS CRIMINAL PROSECUTION.

Adam C. Hanna Date: 7 - 21 - 2014
 Applicant's Signature

Subscribed and sworn to before me this 21st day of July, 2014

My Commission Expires: 11 - 28 - 2016 Michael J. Ferguson Jr.
 (NOTARY PUBLIC)

MICHAEL J. FERGUSON JR.
 NOTARY PUBLIC
 STATE OF COLORADO
 NOTARY ID 20124078788
 MY COMMISSION EXPIRES NOVEMBER 28, 2016

68. The earliest date HANNA was *certified* as a peace officer and therefore eligible to be employed as a law enforcement officer, is 08/01/14. This does not mean HANNA was employed or experienced in law enforcement, only that he was CO POST certified as a peace officer. Certification alone does not bestow police authority; one must also be employed in that capacity by an actual governmental agency. Furthermore, LEOSA does not apply to one who is certified, rather to one who is employed, or was employed for at least 10 years, by a governmental agency.

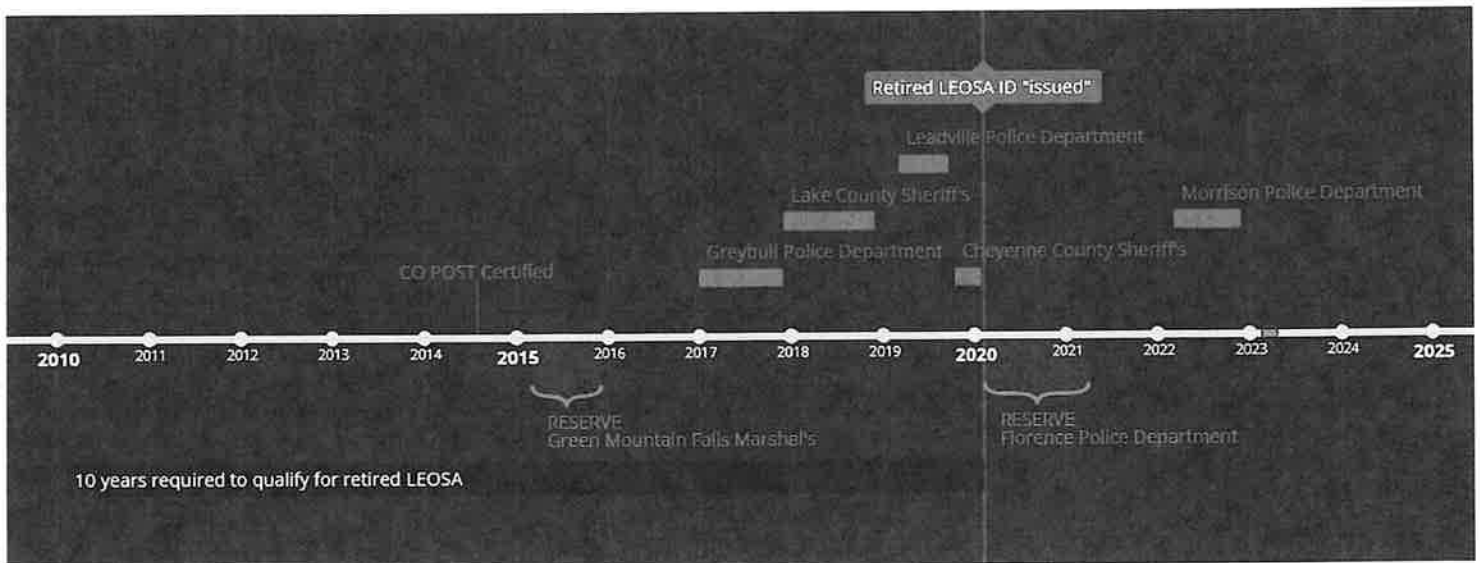
69. Director BOURGERIE explained that each time an officer is appointed to or separated from service in Colorado, the appointing agency has to file a "Form 6" with POST. POST maintains these records and they were provided to me. HANNA has the following appointments/separations on file with CO POST:

- a. Green Mountain Falls Marshal's Office – **reserve** officer appointed on 03/03/15, resigned and separated as a reserve officer on 12/05/15. (9 months)
- b. Lake County Sheriff's Office – **certified** officer appointed on 12/04/17, resigned and separated as a deputy on 12/01/18. (12 months)
- c. Leadville Police Department – **certified** officer appointed on 03/06/19, resigned and separated as a commander on 09/24/19. (6 months)
- d. Cheyenne County Sheriff's Office – **certified** officer appointed on 10/15/19, resigned and separated as Undersheriff on 01/31/20. (~3 months)

- e. Florence Police Department – **reserve** officer appointed on 02/13/20, resigned and separated as a reserve officer on 04/01/21. (13 months)
- f. Morrison Police Department – **certified** officer appointed on 03/07/22, POST certification revoked on 12/02/22. (9 months)

70. KENNETH BLOSSER, the current Chief of Police at the Greybull Police Department in Greybull, Wyoming, confirmed that HANNA was employed as a sworn officer for Greybull from January 2017 to December 2017. Chief BLOSSER explained that Wyoming may issue a temporary WY certification for up to a year, allowing someone to be employed as an officer in WY as long as they are certified in another state. Within that year, the officer is required to challenge the WY POST and attend a condensed academy if they want to obtain their WY certification and continue to be employed as an officer in WY. If they do not obtain WY certification, their temporary certification expires. Chief BLOSSER explained that HANNA was employed for the maximum time allowed on a temporary WY certification and he left prior to challenging the WY POST. According to HANNA’s CO employment records, he started at the Lake County Sheriff’s Office on 12/04/17, so he was only employed at Greybull for 11 months. Chief BLOSSER confirmed that HANNA was likely listed as a reserve officer for Greybull for an additional 6 months, but those months (Jan of 2018 to June of 2018) overlapped with HANNA’s full-time employment at the Lake County Sheriff’s Office in Colorado.

71. The total number of months HANNA is documented as an employed law enforcement officer is 41. The total number of months he is documented as a reserve officer is 22. To include all reserve officer status (without regard for actual time on duty) as law enforcement experience would credit HANNA with a maximum of 63 months, or 5.25 years, of possible law enforcement experience. However, those numbers include experience through December of 2022. The retired LEOSA ID was created in January of 2020. At the time of the creation of that credential, HANNA had 32 months as an employed LE officer (2.66 years), with an additional 9 months as a reserve officer. Therefore, the maximum possible law enforcement experience HANNA could be credited with when the retired LEOSA ID was “issued” is 41 months, or 3.4 years. A timeline is included below for reference:



Security Industry Specialists

72. On 01/31/23, I spoke over the phone with JULIA PRYBYLA, the Director of Human Resources for Security Industry Specialists (SIS). She confirmed that HANNA was hired by SIS in December of 2020, and “separated” in about March of 2021. She explained that SIS separated HANNA from employment as soon as they were notified of Prowers County’s investigation. JULIA said that an employee of SIS, TOM DINNAUER, initiated the investigation into HANNA because “something didn’t feel right” about HANNA’s purported law enforcement experience. She said once TOM started making phone calls to HANNA’s previous employers, it was discovered that HANNA had forged a law enforcement credential, so SIS ended his employment.
73. JULIA explained that to apply with SIS, applicants have to access their website and select a position to apply for. Candidates provide basic information and attach a resume. SIS will then contact applicants for a “phone screen” interview. In this instance, HANNA applied for a private security position as an off duty officer, or ODO. She explained that ODO positions are staffed by active, reserve, and retired police officers and they are required to carry a concealed firearm. She said an SIS ODO recruiter conducts the phone screen to determine if the applicant is qualified in the state where they are applying because each state’s concealed carry laws are different. Because of the different laws, a LEOSA credential is desirable. HANNA was interviewed over the phone by ODO Recruiter DAVID VILLALOBOS. JULIA said HANNA was applying for an ODO position in Texas and according to his answers during the phone screen, he was qualified. She said he was given a verbal job offer, followed by a written offer, and then SIS collected copies of all of his licenses. Once they confirmed his background check and credentials, he was approved for paid assignments as an ODO security officer with SIS. JULIA said she would provide me with all of the materials she had regarding HANNA’s employment with SIS.
74. JULIA provided comprehensive documentation, including job applications, emails, licenses, onboarding documents, and resumes. HANNA applied for 10 different positions with SIS between November of 2017 and February of 2021. None of the positions were in “sales.” Four of the positions were ODO assignments, including the position he was hired for. One of the positions was a “security specialist,” which entailed the duties of a traditional security officer without ODO credentials. SIS positions as a security officer with ODO status pay more than twice as much as security positions without ODO status. For example, a security position HANNA applied for in California paid \$18/hr., whereas two ODO security positions HANNA applied for in CA paid \$38/hr. and \$43/hr. The ODO position he applied for in Texas paid \$35/hr. The other positions HANNA applied for were managerial/supervisory in nature with salaries ranging from \$58,240 to \$80,000.
75. JULIA provided two of HANNA’s resumes, apparently submitted on different dates because one contained more recent work experience. Comparison of the resumes revealed overlapping inconsistencies and neither accurately reflected HANNA’s documented work experience. The following table illustrates the overlapping dates and inaccuracies in the resumes, compared to the actual documented experience:

Resume 1	Resume 2	Documented Records
Blackhawk Protection Services – Security (02/2009-02/2010)	Reynolds Protection – Security (2009-2010)	N/A
Reynolds Protection – Security (02/2010 - 02/2013)	Elite Security Solutions – Security (2010-2015)	
Elite Security Solutions – Security (01/2011 - 08/2014)		
Green Mountain Falls Police (08/2014 - 08/2016)	Green Mountain Falls Police (2013-2015)	(reserve, 9 months) March 2015 to Dec 2015
Greybull Police Department (12/2016 - 12/2017)	Greybull Police Department (2015-2017)	(11 months) Jan 2017 to Dec 2017
Lake County Sheriff’s Office (12/2017 - Present)	Lake County Sheriff’s Office (2017-2019)	(12 months) Dec 2017 to Dec 2018
	Cheyenne County Sheriff’s Office (2019-present)	(~3 months) Oct 2019 to Jan 2020

76. As the above table shows, one resume purports over seven years of law enforcement employment. In reality, HANNA had less than three years of cumulative experience (32 months), with an additional 19 months listed as a reserve when he was hired by SIS in December of 2020.


77. One of the resumes detailed a year of employment at Blackhawk Protection Services in “Security” as a “Commissioned Officer / NOPD Special Officer.” The duties consisted of security officer work, including “helped local law enforcement with crowd control and suppression during large events.” HANNA listed similar security experience with various security companies between 2009 and 2014. As HANNA partially acknowledged during the subcommittee hearing, these positions were non-sworn, private security positions, not law enforcement.

78. According to records provided by JULIA, HANNA completed a phone screen interview with DAVID on 12/18/20, during which DAVID documented that HANNA answered “yes” to having more than 5 years of police experience, having a retired police ID card, and having an “HR218.” HANNA’s misrepresentations during the initial application process, and verbal commitments to the ODO recruiter that he had a retired ID and HR218, reveal his intent and motivation to later provide said materials.


79. Emails provided by SIS show that on 12/26/20, HANNA emailed SIS HR an “ODO Declaration” document that SIS requires for all ODO hires. The declaration clarifies the employee’s law enforcement status and makes clear that licensing/credential requirements change with an officer’s status. The three available statuses are 1) active, 2) retired, and 3) reserve.

80. The first ODO declaration HANNA submitted was signed and dated, but he did not declare a status. HR had to email HANNA to remind him he needed to declare his status. Eventually, HANNA submitted a signed declaration claiming he was “Active,” but provided his “Reserve” officer Florence Police ID. See below screenshots:


FLORENCE POLICE DEPARTMENT



Adam Hanna
 Reserve Officer
 Hgt: 5'9" - Wt: 185
 Start Date: 02/13/2020



Police Chief: Shane Prickett

Signature: 



ODO DECLARATION

You must acknowledge and adhere to the requirements below for the ODO position with Security Industry Specialists, Inc. (SIS).

Only active, reserve, or retired law enforcement officers are eligible for the ODO position. You must be able to provide documentation of your status at all times. Since your law enforcement status may change during your employment with SIS, you must familiarize yourself with the requirements for active/reserve and retired law enforcement officers. You are required to provide appropriate documentation upon change of status.

ACTIVE DUTY/RESERVE LAW ENFORCEMENT

You must remain in good standing with your agency and you must follow your agency's secondary employment policy at all times while working for SIS. If there is any change in your law enforcement status (suspension, termination, resignation, reassignment, retirement, change to reserve, under investigation, IOD, etc.) you must email HR@sis.us and compliance@sis.us within 24 hours. If it is a scheduled change, email HR@sis.us and compliance@sis.us within 24 hours of scheduling (i.e. notify SIS within 24 hours of scheduling your retirement date). You must report any arrests to HR@sis.us and compliance@sis.us within 24 hours.

Please note that licensing/credential requirements change with your status. It may take months to secure the required credentials. You will be unable to work in an ODO capacity without them.

In addition to the requisite employment documents (such as I-9 identification), front and back copies of the documents below must be submitted to HR@sis.us and maintained throughout the duration of your employment:

1. Law Enforcement Officer Identification Card (not expired)
2. Unarmed & Armed Security License(s) if applicable (not expired)
 - Licensing Agency Statute Required Records (e.g. Training)
3. SIS or Client requested certifications & training
4. ODO Experience Summary
5. Driver's License
6. Any other credentials mandated by federal, state, or local law, if applicable
7. Certain reserve officers may need to present additional documentation

RETIRED LAW ENFORCEMENT

You must notify HR@sis.us and compliance@sis.us within 24 hours of any change in retired law enforcement privileges (such as the suspension or revocation of your Retired Law Enforcement ID card or CCW). Additionally, please notify HR@sis.us and compliance@sis.us within 24 hours if you re-enter employment as an active law enforcement officer. You may be eligible for different assignments or licensing exemptions if you are an active officer. You must report any arrests to HR@sis.us and compliance@sis.us within 24 hours.

In addition to the requisite employment documents (such as I-9 identification), front and back copies of the documents below must be submitted to HR@sis.us and maintained throughout the duration of your employment:

1. Retired Law Enforcement Officer Identification Card (not expired)
2. Unarmed & Armed Security License(s) if applicable (not expired)
 - Licensing Agency Statute Required Records (e.g. Training)
3. CCW (not expired) or HR218/LEOSA Qualification Document within last 12 months
4. Proof of firearm requalification or training course within last 12 months
 - Firearm requalification for Law Enforcement Agency, HR218/LEOSA, Security License, or CCW is acceptable or
 - Any other firearms training course is acceptable
5. SIS or Client requested certifications & training
6. ODO Experience Summary
7. Driver's License
8. Any other credentials mandated by federal, state, or local law, if applicable

CURRENT LAW ENFORCEMENT STATUS

- Active
- Retired
- Reserve

I understand and agree that it is my responsibility to meet the requirements for ODO status with SIS. I agree to abide by the requirements and conditions set forth.

Printed Name: ADAM C. HANNA SIS Employee # (if assigned): _____

Signature: *Adam Hanna* Date: 12/24/2020

81. When HANNA made the above declaration, he was a reserve officer at the Florence PD, not an active officer. The ODO declaration form makes clear that SIS distinguishes active officers from reserve officers: "...licensing/credential requirements change with your status. It may take months to secure the required credentials. You will be unable to work in an ODO capacity without them. You may be eligible for different assignments or licensing exemptions if you are an active officer."

82. HANNA was also required by SIS to complete an ODO experience summary. HANNA exaggerated his experience on that form, failed to mention he was a reserve officer, and included "LEOSA Certified," see below: (Note: the date should likely be 01/05/21.)

EMPLOYEE NAME: Adam Hanna EMPLOYEE#: 46312 DATE COMPLETED: 01052020



ODO EXPERIENCE SUMMARY

The information you provide on this form will be used to help us assign you to specialized details if/when they become available. If you have any training certificates related to the duties and/or specializations you describe below, please provide them.

LAW ENFORCEMENT HISTORY

Department/Agency: Florence Police Dept. Start Date: 02/2020 End Date: Still Employed
Title/Rank: Police Officer

Description of Duties:

Law Enforcement Officer enforcing city, state, and federal laws in the City of Florence, Colorado. Certified law enforcement instructor providing in-service training in multiple topics to include defensive tactics, firearms, driving, and less-lethal options

- 2013 - 2015 Green Mountain Falls PD - Police Officer and Instructor
- 2015 - 2017 Greybull PD - K9 Officer and Department Training Coordinator
- 2018 - 2019 Lake County SO - Patrol Deputy, SWAT Commander, Instructor, Senior Sniper
- 2019 - 2020 Cheyenne County SO - Undersheriff, Department Training Coordinator

Describe any specialized training, assignments, or notable achievements related to this employment:


- POST Driving Instructor - SWAT Commander - SWAT Team Leader - SWAT Senior Sniper
- ICS (100,200,300,400) - Crisis Intervention Certified (CIT) - NTOA SWAT Team Leader
- NTOA Less-lethal, FSDD, and Chemical Agents Instructor - Field Training Officer
- Wyoming POST certified Tactical Ops, Less-lethal, and Close Protection Instructor
- American Red Cross certified Instructor for first aid, CPR, and AED
- Law Enforcement K9 Handler - Krav Maga Law Enforcement DT Instructor - Taser Instructor
- Phazzer Senior Instructor - Police Basic Skills and Classroom Instructor - Colorado POS
- NRA LE Firearms Instructor and Range Safety Officer - Law Enforcement Pistol, Shotgun, and Patrol Rifle Instructor - SWAT Basic and Advanced - SWAT Sniper Instructor

EMPLOYEE NAME: Adam Hanna EMPLOYEE#: 46312 DATE COMPLETED: 01052020

Describe any additional experience, education, credentials, achievements, etc. you have which have not yet been addressed:






PPCT Instructor - ESI Corporate/Private Jet Security Training - Baton, Handcuffing,
and OC Instructor - LEOSA Certified - Texas Level 3 & 4 Licensed - Active Shooter Instructor
Law Enforcement Dignitary and Witness Protection Instructor - Investigations

Language Proficiencies: English - Native, Spanish - Elementary, French - Elementary

Signature: 

83. I reviewed all of the emails SIS provided as having been sent from HANNA. None of the emails from HANNA included *any* form of ID from Cheyenne County. His emails did include lengthy PDF packets containing various training records, security licenses, and certificates, but none of those documents included a Cheyenne County ID. This is contrary to HANNA's repeated claims to POST employees and board members that he sent SIS a packet of credentials he scanned that erroneously included his Cheyenne County ID. An example of attachments HANNA did send to SIS is included below:

5 attachments




-  **ODO Declaration.pdf**
1841K
-  **WYTraining_History_Report Hanna.pdf**
120K
-  **SWAT Certifications.pdf**
3161K
-  **SWAT certs II.pdf**
5298K
-  **Instructor Certs - A. Hanna.pdf**
11844K

84. Despite no Cheyenne County ID appearing in any email HANNA sent directly, a LEOSA ID attachment did appear in internal emails between the ODO recruiter DAVID VILLALOBOS, SIS Human Resources, and SIS Compliance. On 12/21/20, DAVID emailed the following attachments to the following recipients within SIS:

David Villalobos <davidvillalobos@sis.us> Mon, Dec 21, 2020 at 10:21 AM
To: Human Resources <hr@sis.us>, Compliance <compliance@sis.us>, Stephanie Li <sli@sis.us>

David Villalobos
Corporate Off Duty Officer (ODO) Recruiter
Security Industry Specialists, Inc. (SIS)
Office: 1-877-402-9056 | Mobile: 408-228-2115
Los Angeles * New York * San Jose * Seattle * Miami * Brazil * Mexico City
SIS Website | Job Alerts | Job Openings | **To Apply: Text "SIS" to 57682**

3 attachments

-  **A. Hanna - Passport.pdf**
374K
-  **LEOSA - Hanna.pdf**
1836K
-  **Active LEO ID & BSIS Cards - A. Hanna.pdf**
2684K

85. Based on the attachments DAVID sent, SIS had the following email exchange:

Courtney Chobanian <cchobanian@sis.us> Mon, Dec 21, 2020 at 10:40 AM
To: David Villalobos <davidvillalobos@sis.us>
Cc: Human Resources <hr@sis.us>, Compliance <compliance@sis.us>, Stephanie Li <sli@sis.us>

HR, please let us know when background clears. FYI out of state retirees have more hoops to jump through with TX licensing so it always takes longer.

Courtney Chobanian
Senior Manager, Licensing & Compliance
Security Industry Specialists, Inc. (SIS)

David Villalobos <davidvillalobos@sis.us> Mon, Dec 21, 2020 at 10:44 AM
To: Courtney Chobanian <cchobanian@sis.us>
Cc: Human Resources <hr@sis.us>, Compliance <compliance@sis.us>, Stephanie Li <sli@sis.us>

Hi team,
Adam is an active reserve officer aslo.
[Quoted text hidden]

Courtney Chobanian <cchobanian@sis.us> Mon, Dec 21, 2020 at 10:56 AM
To: David Villalobos <davidvillalobos@sis.us>
Cc: Human Resources <hr@sis.us>, Compliance <compliance@sis.us>, Stephanie Li <sli@sis.us>



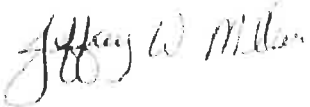


Hi David,

Thanks for the reminder. Only full time TX LEOs are exempt from licensure. And without a TCOLE number, he'll have to jump through the same hoops as a retired guy from out of state. It's possible he may get some kind of exemptions, but I wouldn't count on it.

Best,

Courtney

86. JULIA provided the above referenced "LEOSA – Hanna.pdf" attachment that DAVID sent via email; see below screenshots:

<p>Cheyenne County Sheriff</p>   <p>Issued: 2/10/2020 Expires: 2/10/2030 Undersheriff</p>	<p>THIS CARD DOES NOT CONVEY LAW ENFORCEMENT AUTHORITY</p> <p>The person identified on the front of this card is a retired law enforcement officer as approved by the signature authority below who has met the requirements for concealed carry of a firearm pursuant to 18 USC 926c.</p>  <p>www.co.cheyenne.co.us/iscountydepartmentsheriff</p>
<p>Adam Charles RETIRED Hanna LAW</p>	<p>BLSI, CO_LEO, COPOST-FI, 00000, CID1, CO_GREN, IC, CSP_LLMUN, CO_RNGOFC, SWATC, SWATTTTIII</p>
<p>Retired Date:</p> <p>18 USC 926c</p>  <p>Colorado</p>	 <p>Please Return To: Cheyenne County Sheriff 91 East 1st Street Cheyenne Wells, CO 80810</p>

87. The above retired LEOSA ID is identical to the document that SIS provided to Prowers County (contained in their casefile) and that the D.A.'s Office in the 15th provided to HANNA's defense counsel in the discovery packet. It is also the same document HANNA was shown during the show cause hearing. This is the only Cheyenne County ID – of any type – that SIS provided. None of the documents, emails, or PDF packets SIS provided to me contained a Cheyenne County ID other than this one.

88. On 02/21/23, I spoke with DAVID over the phone and he confirmed he was previously employed by SIS as an ODO recruiter. DAVID explained that he hired hundreds of ODO positions over the years. He said ODO positions had to have active or retired law enforcement ID with a concealed carry permit. He said after a candidate was offered a position, DAVID would gather copies of their credentials from them and then label them appropriately before emailing them to HR and Compliance to be filed. DAVID said candidates would email or text photos of their credentials to DAVID's work phone or computer. DAVID would identify what they were and forward them on. When I explained that JULIA provided an internal email from DAVID that had an attachment labeled "LEOSA – Hanna.pdf," DAVID confirmed that sounded like a document title he

would have created using a photo or scan of HANNA's credentials. He was clear that HANNA had to have provided him the photo or scan, but DAVID likely converted the photos to a PDF file and labeled it so HR and Compliance could file it. DAVID said his SIS email was no longer active and he had turned in his work phone and computer, so he did not have access to any originals. DAVID said he never forwarded anything on that HANNA himself had not provided as part of the employment process. It is important to note that DAVID also internally forwarded scans of HANNA's passport. SIS emails never show HANNA emailing his passport, so DAVID must have also obtained a copy of the passport directly from HANNA.

89. DAVID recalled that after he hired HANNA, HANNA applied for another internal job with SIS. DAVID recalled that TOM DINNAUER gave DAVID a hard time for hiring HANNA because TOM looked into HANNA's credentials as part of HANNA's most recent application and said it seemed like HANNA was "full of shit."
90. On 02/21/23, I spoke with TOM over the phone and he confirmed he was a retired SWAT officer in CA and had also retired from SIS. TOM recalled that HANNA's resume came across his desk at SIS because HANNA applied for a training position at SIS and HR wanted TOM's opinion on his credentials. TOM said HANNA's resume and materials were embellished and had several red flags. He said he started doing his due diligence by calling previous employers. He recalled learning that HANNA had fabricated a retired police ID and an investigation ensued in Colorado. TOM confirmed that no outside person or agency had contacted him with this information, rather, he was asked by HR to look into HANNA because HANNA's resume made it look like he had "taken every class known to law enforcement" and it didn't add up. TOM said although he did not personally know HANNA, TOM took what he learned personal because he spent his career in law enforcement and HANNA was presenting himself as someone he wasn't.

Salamander Live System

91. On 01/30/23, I spoke over the phone with BRENDEN OURTH, a sales and support specialist with Midwest Card and ID Solutions. He explained that he provides support for Colorado DHSEM, a client that uses Salamander. He said Salamander is an online platform accessed by a computer connected to the internet. BRENDEN said he had administrative access to the Salamander system and he queried ADAM HANNA. BRENDEN advised that HANNA's profile was still in the Salamander system, but it had been "terminated." BRENDEN advised that having a profile in Salamander does not mean that person has a login; profiles are created and maintained by an agency manager with a login. BRENDEN said most agencies designate only one person to have an admin login to manage that agency's profiles. BRENDEN advised that apart from having a profile, HANNA also had an admin login to the Salamander system. He said HANNA's account gave him full admin rights to the agencies "Cheyenne County" and "Cheyenne County Sheriff." BRENDEN said this means HANNA had the ability to create database records (profiles) and print database records (IDs). He said HANNA's login account had also been terminated, so HANNA could no longer login.
92. BRENDEN explained that the issued date and expiration date fields are available when a credential is printed. He said those fields are free form and the admin user can manually enter whatever dates they need; however, the State of Colorado creates

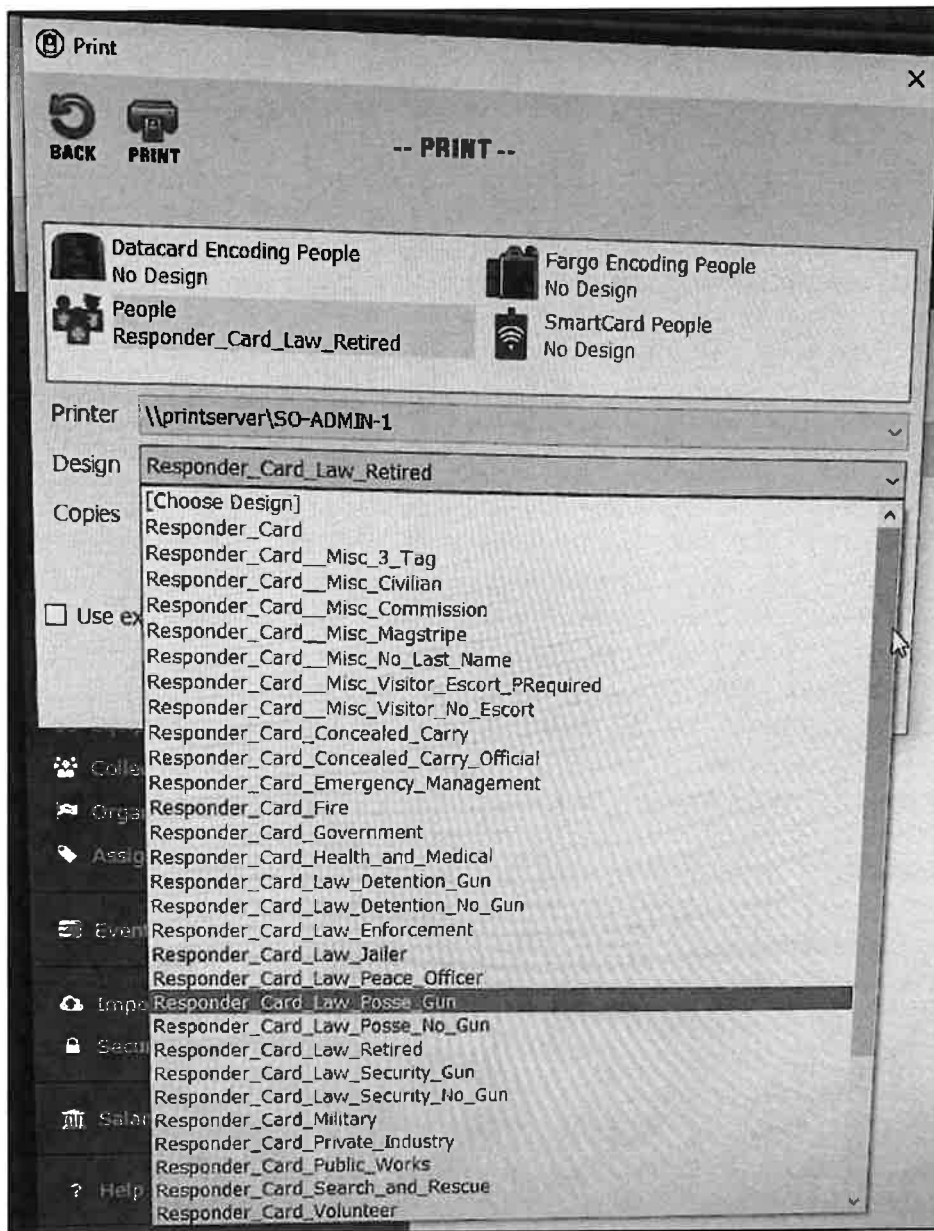
policy on how those dates should be entered. BRENDEN further explained that the Salamander system retains print preferences on the local computer. Profiles in Salamander are retained online, but the ID might print differently depending on what the local computer and printer settings are when and where the ID is printed.

93. BRENDEN examined the ADAM HANNA profile and said there were a lot of qualifications added to the profile and in his experience, most profiles do not have that many qualifications. He said there were qualifications on the profile that were set to not be embedded in the QR code and not be printed on the back of the ID, which was odd. He explained that the HANNA profile also had some “legacy training codes” added to the profile and some codes that no one really used, which he also found odd.
94. BRENDEN said the Salamander software keeps detailed logs of all activity on profile accounts. He said he had access to this log and it captures all changes that are made to any profile, as well as the admin user account that made them. BRENDEN explained that DHSEM owned the information in the State Salamander system and they also had access to these logs. He put me in contact with the Logistics Unit Chief of DHSEM, MARCI LINTON.
95. On 02/06/23, MARCI put me in touch with her Deputy Logistics Unit Chief, PAUL MORENO. PAUL’s position deals intricately with Colorado’s structure and use of the Salamander system. PAUL advised that the State refers to admin users of Salamander as “security users.” He advised that individual agencies select their security users and HANNA was previously Cheyenne County’s security user. PAUL advised that he (PAUL) ran a “Responder Change Log” on HANNA’s profile and it shows all changes to that profile over time and what security user made them. PAUL provided the log to me and walked me through it line by line.
96. The log shows that on 10/23/19, HANNA’s archived Leadville Police profile was changed from TM (terminated) to “active” by Midwest Card and ID Solutions employee JONATHAN MULLINAX. Security user “adam.hanna” then updated HANNA’s profile hire date from 03/06/19 (the date of HANNA’s previous appointment with Leadville), to 10/14/19 (HANNA was appointed at Cheyenne County on 10/15/19). “adam.hanna” then updated his rank from detective to Undersheriff. Over the next approximately 15 minutes, “adam.hanna” added the following 24 qualifications to the profile:
 - Emergency Services Rescue Technician [ESRT], Law Enforcement Officer [LEO], Advanced ICS [ICS400], SWAT Commander [SWATC], Basic ICS [ICS200], BLS Inst [BLSI], CPR/First Aid/ AED training [00000], Crisis Intervention and De-escalation [CID1], FEMA NIMS An Introduction [IS700], Introduction to ICS [ICS100], Intermediate ICS [ICS300], IS-700b National Incident Command System [IS-700b], IS-800a National Response Plan [IS-800a], Weapon Qualification Certification [CCW], Incident Commander Qualified [IC], Taser Instructor [CO_TASINST], Rifle instructor [CO_RIFINST], Range Officer [CO_RNGOFC], Critical Incident Team [CO_CritIT], CO_Statutory and/or POST Certified Peace Officer [CO_LEO], Grenadier [CO_GREN], Field Intelligence Team [CSP_Fintel], Less Lethal Munitions User [CSP_LLMUN], SWAT/Tactical Teams Type III [SWATTTTIII].
97. On 10/23/19, “adam.hanna” deleted the Emergency Services Rescue Technician [ESRT] qualification. “adam.hanna” changed the expiration date to 01/01/22 and the

issued date to 10/23/19. "adam.hanna" then printed five IDs over about a ten minute period. "adam.hanna" then updated the profile's citizenship country to the U.S. and removed the Field Intelligence Team [CSP_Fintel] qualification. No further changes were logged on 10/23/19.

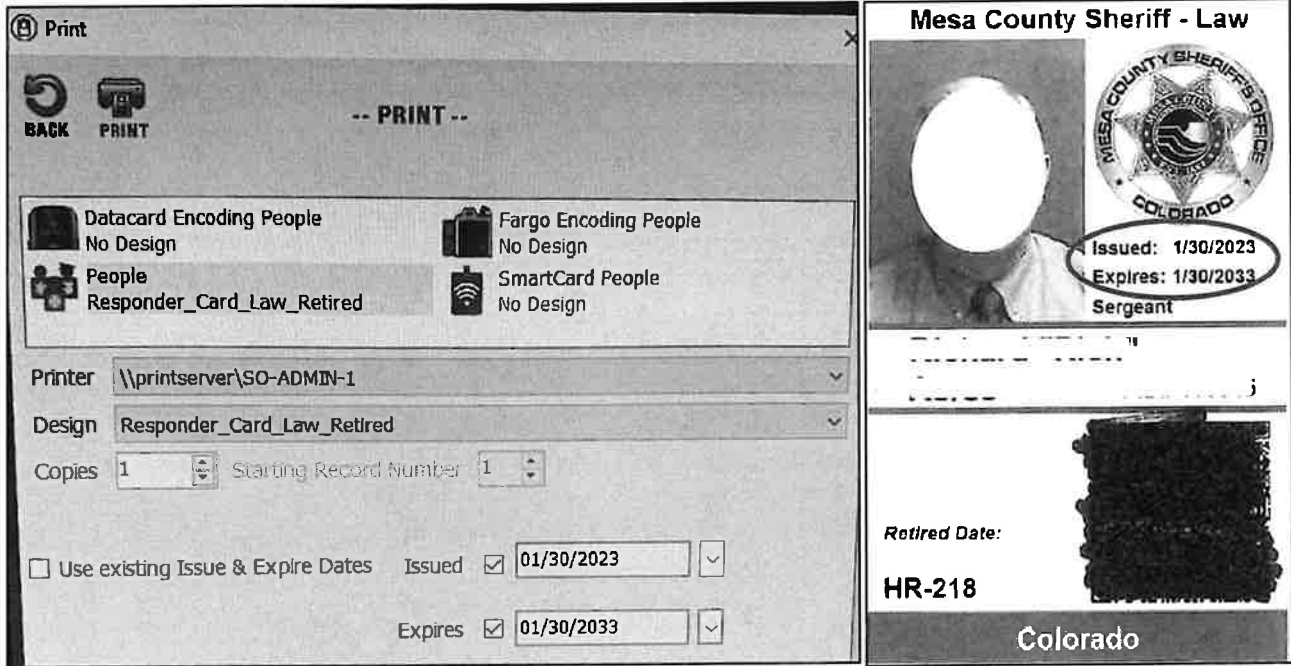
98. The next logged changes were made on 10/31/19, when "adam.hanna" changed the expiration date to 01/09/22 and the issued date to 10/14/19. "adam.hanna" then printed a sixth ID. About 10 minutes later, "adam.hanna" changed the expiration date to 01/26/22 and printed a seventh ID.
99. The next logged changes occurred on 11/02/19 when "adam.hanna" changed the expiration date to 02/14/22, the issued date to 11/02/19, and then printed an eighth ID. Several minutes later, "adam.hanna" added Colorado POST Firearms Instructor [COPOST-FI] and Colorado POST Driving Instructor [COPOST-DI] qualifications to the profile and printed a ninth ID.
100. The next logged changes occurred on 01/24/20 when "adam.hanna" changed the expiration date to 01/01/25 and printed a 10th ID. Several minutes later, "adam.hanna" changed the expiration date to 10/14/24 and the issued date to 10/14/19. "adam.hanna" then printed an 11th ID. Several minutes later, "adam.hanna" changed the expiration date to 02/10/30 and the issued date to 02/10/20. "adam.hanna" then printed a 12th and final ID.
101. The next and final logged change was on 03/02/21 when security user "tim.washington" changed HANNA's profile status to "terminated."
102. The log PAUL provided shows that HANNA's security user ("adam.hanna") was the only user who changed the HANNA profile during the course of his employment at Cheyenne County. The log shows that HANNA's security user added extraneous qualifications to his profile that are consistent with HANNA's SIS application materials. And the log shows that the last card HANNA printed had expiration and issued dates identical to the dates displayed on the retired LEOSA ID SIS had on file for HANNA.
103. Of note, HANNA commented twice during POST proceedings that the issued date on the retired LEOSA ID was his birthday, February 10th. Specifically, the issued date chosen for the retired LEOSA ID was 02/10/20, HANNA's 31st birthday (he was born in 1989). Most law enforcement agencies in the U.S., and the overwhelming majority in CO, require officers to be at least 21 years old to be qualified for hire. Therefore, for nearly all employed officers, the earliest date one could theoretically qualify for a retired LEOSA ID, assuming their employment started on their 21st birthday and was continuous for 10 years thereafter, would be on their 31st birthday.
104. The Mesa County Sheriff's Office uses the Salamander system and their security user is BERNICE STOGSDILL. With BERNICE's permission and guidance, I interfaced with the Salamander system to better understand how various IDs could be printed. I learned that after a profile is created, there are various design templates of IDs that can be printed using the same profile. PAUL confirmed that these templates are created and updated by his State team, in conjunction with Salamander. PAUL explained that the State makes these templates available for individual agencies to use as the agency deems appropriate. One of the templates the State makes available

is a retired law enforcement ID with LEOSA credentials. BERNICE and I found that we could print any of the MCSO profiles with any available template applied. Mesa County had 29 different card templates available. The below screenshot shows what it looks like when selecting the design template during printing:



105. PAUL confirmed with Salamander engineers that the Salamander software does not log what design template is selected when an ID is printed, only that an ID was printed. Therefore, the 12 different IDs that security user "adam.hanna" printed for his profile could have had different design templates applied and that information is not in the log. HANNA could have, for example, printed for himself multiple IDs for various purposes, such as a concealed carry permit, a Fire employee ID, a Military ID, etc.

106. BERNICE and I confirmed that when an ID is printed, custom "issued" and "expires" dates can be populated with any date. As a test, we were able to print a retired LEOSA ID for a current MCSO employee with an expiration date in 2033, see below:

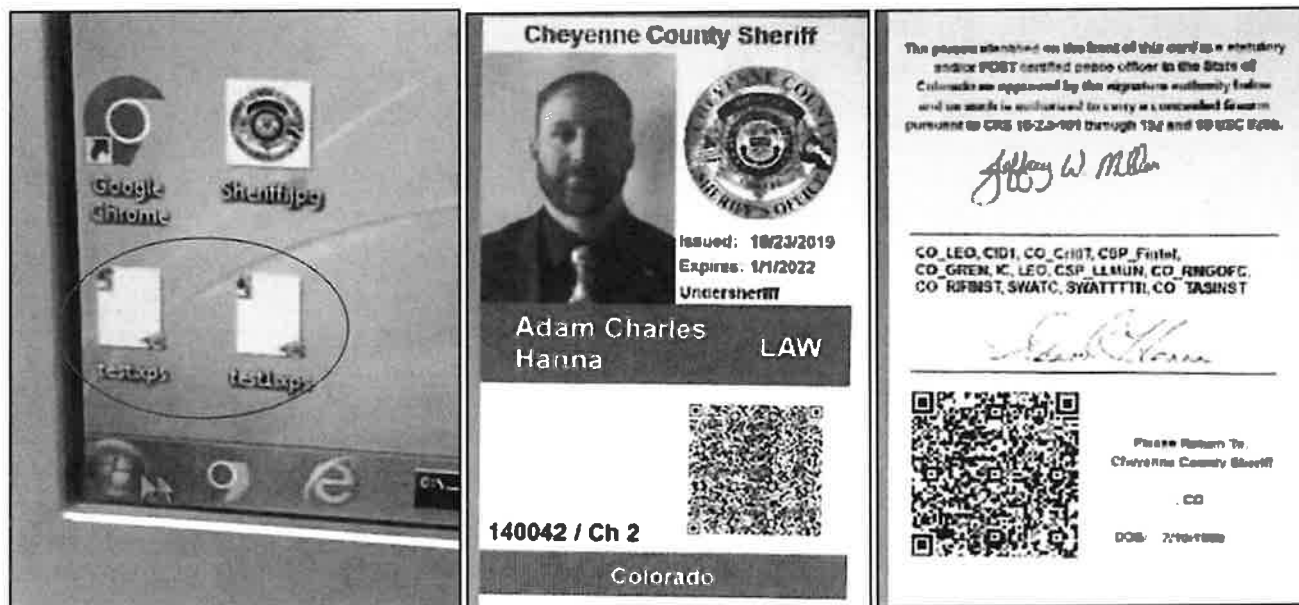


Cheyenne County

107. In March of 2023, I had ongoing contact with the current Undersheriff of Cheyenne County, JOSEPH (JOE) CONNER. Undersheriff CONNER advised that he started at Cheyenne County Sheriff’s Office (CCSO) in 2018 and was a Sheriff’s Deputy when HANNA was hired. He advised that for the duration of his (CONNER’s) employment, CCSO has issued employee IDs using a program called “Asure ID 7” on a Windows computer connected to an ID printer. Undersheriff CONNER advised that before HANNA was hired, and since HANNA left, employee IDs were and are made using “Asure ID 7,” not Salamander. Undersheriff CONNER advised that in 2019, HANNA issued him (CONNER) a Salamander ID in addition to CONNER’s normal CCSO ID; he did not know why he was also issued a Salamander ID. Undersheriff CONNER advised that the only person he knew to have access to Salamander at CCSO was HANNA. Undersheriff CONNER explained that CCSO only has one ID printer and it is used to print standard employee IDs, but HANNA also used it to print Salamander IDs.
108. Undersheriff CONNER advised that the computer is still in the same room where it was when HANNA was there, it has a “generic” login for employee use, and there is no record of which employee was logged in when. He advised there are security cameras in the room, but footage is only retained for about 30 days. Undersheriff CONNER said he has never seen anyone else logged into the online Salamander system and he does not know how to access it. He advised the current Sheriff also does not know how to access Salamander.
109. Undersheriff CONNER provided police dispatch records showing that HANNA was on duty on each of the dates the Salamander “Responder Change Log” shows that “adam.hanna” printed IDs: 10/23/19, 10/31/19, 11/02/19, and 01/24/20.
110. Undersheriff CONNER sent photos of his standard CCSO employee ID (left), and the Salamander ID that HANNA issued to him in 2019 (right); see below:



111. Undersheriff CONNER explained that “Ch 4” is CONNER’s radio call sign. He said when HANNA was at CCSO, HANNA’s call sign was “Ch 2.” Undersheriff CONNER checked the “Asure ID 7” software and did not locate a design template for HANNA. He was able to locate design templates for other prior employees. Undersheriff CONNER did not know if HANNA issued himself, or was issued, a standard CCSO employee ID, or if HANNA issued himself an employee ID using Salamander. He located an apparent test print of a Salamander “Law” ID for HANNA that was saved as an .xps file on the computer’s desktop. Undersheriff CONNER provided documentation that the .xps files were created on 10/23/19, the same day security user “adam.hanna” first printed IDs from the Salamander system. Screenshots of the files on the desktop and the test ID are included below:



112. Undersheriff CONNER was unable to establish definitively what HANNA's CCSO employee ID looked like. Undersheriff CONNER advised me to contact the former Sheriff, JEFFREY MILLER, as he may have more information.

113. I spoke with former CCSO Sheriff JEFFREY (JEFF) MILLER on 03/09/23. JEFF confirmed that he was the Sheriff who hired HANNA in 2019. He said he hired him because HANNA had more training in his file than JEFF and everyone else at CCSO combined. He said he initially trusted HANNA, but now believes he is "very dishonest." He explained that he received a call from a security company talking about a badge with JEFF's Sheriff signature on it that JEFF did not issue. He said he had never issued a retired ID to anyone, ever, so he knew it was fraudulent. He said he turned the investigation over to Prowers County and has had nothing else to do with it. He confirmed that since that time, he (JEFF) is no longer employed at CCSO and he (JEFF) was the subject of a separate criminal case. I later confirmed that JEFF's CO POST certification was revoked in June of 2022 for a disqualifying misdemeanor offense of official misconduct. I confirmed with the 15th JD D.A.'s Office that JEFF's official misconduct charge was in no way related to HANNA or HANNA's employment, but stemmed from JEFF's illegal use of a government vehicle during a domestic dispute.

114. JEFF said he was unfamiliar with the Salamander system himself, but did recall that the northeast region Office of Emergency Management was "pushing hard" for CCSO to use the Salamander system. He said HANNA knew about the Salamander system from his experience at a previous agency, so HANNA set it up for CCSO for "accountability and resource management." JEFF said he did not think CCSO ever used Salamander to issue employee IDs. JEFF confirmed that HANNA had access to the system, but JEFF never got involved with the details of what HANNA was doing with it. JEFF said HANNA's resignation was "a blessing in disguise." He said HANNA was claiming hours he wasn't working and after HANNA left, the labor board did an investigation. JEFF believed HANNA likely filed the complaint. JEFF believed the investigation showed CCSO was substantially in compliance, although some employees, including HANNA, did receive additional pay afterward. JEFF said when HANNA resigned, HANNA was on the verge of being fired. He said HANNA left on good terms in that they were not using harsh language toward one another, but JEFF had no intention of ever employing HANNA again. JEFF did not recall recording HANNA's exit interview and did not believe he would have.

115. In response to my inquiries, Undersheriff CONNER obtained an audio file on an audio recorder that was located in former Sheriff MILLER's file cabinet. The recording was documented as being created on 01/29/19, but the context of the conversation is JEFF and HANNA discussing HANNA's pending resignation. HANNA resigned on 01/31/20; therefore, the documented date of the recording appears to be a year off. In the audio, JEFF and HANNA are speaking cordially about HANNA receiving a job offer paying \$4000/week as a bodyguard for an actor. HANNA says he would need to have one week a month off as Undersheriff for an indeterminate amount of time. JEFF replies that he does not believe that is fair to the organization or the tax payers. HANNA suggests he could remain on as a reserve deputy to help with training and to keep his POST certification. JEFF replies that CCSO does not have a reserve deputy program and never has. HANNA replies that he has researched CCSO's policy and believes there is a reserve program and since he will be making good pay elsewhere, he would

be willing to “work for free” as a reserve. JEFF clarifies that the policy is a guideline on what a reserve program could look like, but that there is no reserve program at CCSO.

116. They go on to discuss HANNA’s finances, including that HANNA cannot make ends meet on his CCSO salary and he’s maxing out his credit cards; he has to make payments on a new, \$80,000 truck; his income as a bodyguard is good, but spotty; and that HANNA made \$92,000 operating his private training company in 2019, but income from his training company is not stable. JEFF talks about not knowing if it is legal to declare HANNA a reserve officer with POST when CCSO does not actually have a reserve program. JEFF suggests that HANNA can research creating a reserve officer program. The conversation ends with JEFF telling HANNA that he needs to make whatever decision is best for him.
117. The tone and content of the recorded conversation is consistent with what HANNA wrote in the letter of resignation he made reference to and provided to POST. The conversation is not consistent with HANNA’s verbal and written claims to POST staff and board members that he was going to “deploy” overseas as a “designated marksman”; however, the motivation – more pay – is consistent. The recording makes clear that HANNA specifically sought to use a reserve officer status to maintain his POST certification while he left government employment to make more money in a synergistic private sector.

Additional Follow Up

118. On 02/03/23, I spoke with Officer SCOTT DREWRY of the Basin Police Department in Basin, WY. He was formerly a Sergeant with Greybull Police and was so employed when HANNA was hired. Officer DREWRY said he believed HANNA “was a fraud from the beginning,” but the Chief of Greybull at the time liked HANNA. Officer DREWRY said HANNA told him he was a SWAT officer, K9 handler, and K9 handler trainer. He said the Chief had a narcotics K9 from a previous officer that he assigned to HANNA when he was hired. Officer DREWRY said he supervised HANNA on a modified field training program and he could tell he had “zero, or very little law enforcement experience.” Officer DREWRY mentioned several disciplinary and “honesty issues” he observed during HANNA’s brief employment with Greybull. He detailed HANNA’s K9 consistently “alerting” on vehicles, but no narcotics being found; HANNA selling a short-barreled rifle with a suppressor to the former Chief, without the required tax stamps to legally possess them; and HANNA taking a government-owned patrol car to Florida for training without authorization, and then lying about it.
119. Officer DREWRY advised that the former Chief made HANNA the training coordinator for the department and as such, HANNA had access to input training records into the Wyoming POST training portal, “Acadis.” I recalled that HANNA submitted a WY POST training history to SIS. Officer DREWRY advised that HANNA was who submitted that information to WY POST. I went through the training records on HANNA’s submitted document and Officer DREWRY believed some of the training was valid, and some of it was fabricated/exaggerated. Of note, HANNA’s WY POST training history includes HANNA’s Colorado basic police academy experience, as well as college experience, which appears out of place. Shockingly, the document credits HANNA with 4600 college credit hours at “Pikes Peak,” see below:

<i>Course Title (Course No.)</i>	<i>Training Dates</i>		<i>Grade</i>	<i>Status</i>	<i>Training Category</i>	<i>Hours</i>
COLLEGE CREDIT HOURS PIKES PEAK	08/03/2014	08/03/2014	N/A	Complete		4600h 0m
COLORADO BASIC	08/01/2014	08/01/2014	N/A	Complete		645h 0m
Total Hours						(5245h 0m)

120. HANNA has been appointed at law enforcement agencies in five different judicial districts in Colorado. I contacted each district to inquire how many criminal cases (open or closed) at each District Attorney’s Office HANNA was listed as a professional witness.

- a. The D.A.’s Office in the 4th, who has jurisdiction over the Green Mountain Falls Marshal’s Office, advised that HANNA was not listed as a police witness on any case.
- b. The D.A.’s Office in the 5th, who has jurisdiction over the Lake County Sheriff’s Office and the Leadville Police Department, advised that HANNA was listed as a police witness in 27 cases.
- c. The D.A.’s Office in the 15th, who has jurisdiction over the Cheyenne County Sheriff’s Office, advised that HANNA was listed as a police witness in 3 cases.
- d. The D.A.’s Office in the 11th, who has jurisdiction over the Florence Police Department, advised that HANNA was listed as a police witness in 10 cases.
- e. The D.A.’s Office in the 1st, who has jurisdiction over the Morrison Police Department, advised that HANNA was listed as a police witness in 17 cases.

121. When researching HANNA’s involved cases in the 5th, D.A. Investigator ROBINSON located a *Brady* letter from the Leadville PD in their file. See below screenshot:

Date: 10/01/2019

District Attorney or designee

Re: Adam Hanna

This letter is to inform you that there may be information in the personnel file of Adam Hanna that may affect his/her credibility in court.

Sincerely,
Leadville Police Department

Chief Saige Bertolas- /S/

- 122. On 03/22/23, I spoke with HANNA over the phone. After I explained the nature of this investigation, he declined to answer any questions before speaking to an attorney.
- 123. During his various interactions with POST between 05/03/22 and 10/07/22, ADAM HANNA was employed as a peace officer at the Morrison Police Department and as such, he was a public servant as defined in CRS §18-1-901(o).
- 124. Board members of the Colorado Department of Law Peace Officer Standards and Training (POST) are public servants as defined in CRS §18-1-901(o).
- 125. Staff members of the Colorado Department of Law Peace Officer Standards and Training (POST) are public servants as defined in CRS §18-1-901(o).
- 126. Based on the aforementioned, I believe probable cause exists that between **05/03/22** and **10/07/22**, in the County of Mesa and the State of Colorado, **ADAM CHARLES HANNA** committed the offenses of:

CRS § 18-8-306: Attempt to influence a public servant F4

When on 05/03/22, ADAM HANNA, in the State of Colorado, did attempt to influence the Director of Colorado Peace Officer Standards and Training, ERIK BOURGERIE, by means of deceit, with the intent to alter Director BOURGERIE's decision on whether or not it was in the public interest to recommend the revocation of HANNA's Colorado peace officer certification; **and**

CRS § 18-8-306: Attempt to influence a public servant F4

When on 09/09/22, ADAM HANNA, in the State of Colorado, did attempt to influence each of the Colorado Peace Officer Standards and Training board members, by means of deceit, with the intent to alter the board's decision on whether or not to grant HANNA a subcommittee hearing concerning the revocation of his Colorado peace officer certification; **and**

CRS § 18-8-306: Attempt to influence a public servant F4

When on 10/07/22, ADAM HANNA, in the State of Colorado, did attempt to influence each of the Colorado Peace Officer Standards and Training board subcommittee members, by means of deceit, with the intent to alter the board subcommittee's decision on whether or not to uphold Director BOURGERIE's recommendation to revoke HANNA's Colorado peace officer certification; **and**

CRS § 18-8-404(1)(a)/(c): First degree official misconduct M1

When between 05/03/22 and 10/07/22, ADAM HANNA, a public servant, in the State of Colorado, with intent to retain his Colorado peace officer certification, did knowingly (a) utilize his official position and resources as a police officer for the Morrison Police Department to deceive POST board members and employees, and (c) violate CRS § 18-8-306.

