

# THE TRUTH ABOUT OCCUPY JEFFERSON

HOW AN ENTIRE CITY AND COUNTY GOVERNMENT WRONGFULLY CONVICTED AND THEN COVERED UP A 100% VERIFIABLY INNOCENT PERSON IN BROAD DAYLIGHT USING FACTUALLY FABRICATED EVIDENCE, AND TO THIS DAY STILL REFUSES TO EXONERATE HIM DESPITE RECEIVING CLEAR AND CONVINCING EVIDENCE TO THE CONTRARY.



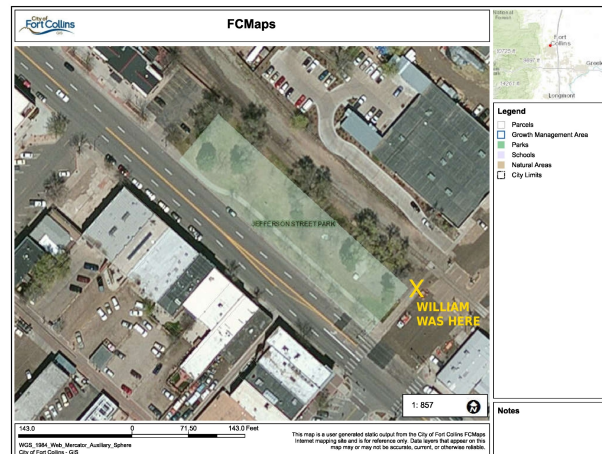
## PARKS DEPARTMENT MAP

GREEN = SERVICE/MAINTENANCE BOUNDARIES  
RED = OUTDATED "POLYGON FILE" (VESTIGIAL)



## GIS DEPARTMENT MAP

OFFICIAL MAP SOURCED FROM LEASE  
(THE MAP FCPD SHOULD HAVE USED)



## INTRODUCTION:

William was wrongfully convicted of being in a park by a Fort Collins Police Officer who unlawfully arrested him on a public sidewalk using an internal-use-only maintenance map carelessly obtained from the wrong city department, and who then unlawfully secured his conviction in court by lying to a jury about its purported officialness and authenticity.

William has since obtained the correct park boundaries from the correct city department, as well as the lease itself for the property, and has even found a survey pin in the ground that precisely coincides with such – all of which substantiates conclusively that he had been standing well outside of the true park boundaries when he was wrongfully arrested by the officer – and has presented this plainly exculpatory information to both city and county governmental officials, only to be further systematically denied relief by them. **Evidently the government would rather “ratify” the wrong boundaries of a park as now the new, official boundaries of a park, than hold themselves accountable.**

William has exhausted all traditional avenues of relief in this matter, and is now seeking assistance from the outside world. Such unethical, unacceptable, and downright unconscionable behavior on the part of his perpetrators does not deserve to go unnoticed and unaddressed. **Please look into the extensive information that William has compiled on the subject, and consider helping him overturn his wrongful conviction / have the officer who caused it charged with committing felony perjury. Thank you!**

**Change.org Petition:** <http://chnng.it/PtL7vJmHqM>

**Website w/ Links:** <http://www.thetruthaboutoccupyjefferson.com>

**YouTube Playlist:** <http://www.youtube.com/playlist?list=PLjxRs72qy9z-13c5WYYTB3LciHyRyktwo>

Also, William and his brother can always use more financial help to process this and their many other cases with, so if you can, please consider donating to their cause here: <http://www.gofundme.com/helpfightcopfraud>. Thank you!

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## SYNOPSIS:

In September of 2015, an Occupy Jefferson Protest was held in the city of Fort Collins, CO. During this protest William Montgomery and other protesters eventually moved themselves from inside Jefferson Street Park, to a nearby publicly owned and maintained sidewalk that was not part of the park, so as to keep being able to protest throughout the nights without fearing arrest. Sergeant Giddings of the Fort Collins Police Department, along with several other officers, arrested William and these other protesters on this public sidewalk anyways, for allegedly still being inside the park, by using an internal-use-only service-and-maintenance-related map that Giddings had erroneously and carelessly obtained from the wrong city department.

In William's trial over the matter, Sergeant Giddings committed first degree criminal perjury by fabricating two lies to the court: (1) that the map he used was “the official boundary map for Jefferson Street Park” and (2) that he had obtained this boundary map from “the official source for park boundaries within the city, the Fort Collins Parks Department.” Both claims were left unsubstantiated, however, and were

otherwise supposed to be considered inadmissible hearsay, as nobody from the Parks Department had been subpoenaed to court that day to testify to their truthfulness. William was wrongfully convicted nonetheless, of being inside the park when he actually hadn't been, despite the map offered by Sergeant Giddings not being the true boundary map of Jefferson Street Park. Sadly, William could have fairly been found not guilty, in fact, had the prosecutor simply acknowledged his legitimate objections to the map's purported authenticity, and had the jury likewise rejected its admission into evidence for not being fairly substantiated and legitimate testimony otherwise.

During the protest and after it ended, William visited several city departments to investigate into Sergeant Giddings' claims. First, he spoke with the Streets Department, who confirmed with him that the public sidewalk at issue was part of the adjacent street's 100-foot-wide right-of-way, and not part of the park. Next, he spoke with the Parks Department itself, who personally informed him that (1) they were not, by any means, the official source for park boundaries within the city, (2) the map to which they had once provided to Sergeant Giddings was not the official boundary map for Jefferson Street Park, and (3) they had never once attested to such things, let alone to Sergeant Giddings. In fact, said map was no longer able to be found on their servers when they went to go look for it. Moreover, while William was there he even spoke with the creator herself of the controversial map they had originally provided to Sergeant Giddings, and who informed him that it was purposefully drawn up by her to include the nearby sidewalk, but was otherwise intended specifically and exclusively for internal, service, and maintenance purposes only. (She, and other Parks Department members, said that their internal maps are commonly drawn up to include nearby sidewalks, so as to make it easier for the city to service and maintain them.) Eventually William discovered the official boundary map of Jefferson Street Park at the Fort Collins GIS Department, and was even able to find the official lease for the park down at the Fort Collins Real Estate Department (and to which also included in it an official boundary map of the park).

William attempted to appeal his wrongful conviction with this plainly exculpatory information he had recently gathered in mind, but was unsuccessful in doing so. Unfortunately, despite receiving more than enough "clear and convincing" evidence to exonerate him with, the Larimer County District Attorney refused to acknowledge that he had wrongfully convicted William, and decided, instead, to "ratify" what Sergeant Giddings had unlawfully established in court one day – that the official source for park boundaries within the City Of Fort Collins, is, in fact, "the Parks Department" (even though it's not), and that the map obtained by Giddings was, in fact, "the official boundary map for Jefferson Street Park" (even though it wasn't).

Despite remaining wrongfully convicted in the matter, William still reported the verifiable perjury committed by Sergeant Giddings, and the fact that he had since discovered the correct park boundaries of Jefferson Street Park, to the Fort Collins Police Internal Affairs Department. Unfortunately all five members of the Internal Affairs Department systematically denied all wrongdoing on the part of their inferior officer, and summarily dismissed William's claims as unfounded. At one point in time, William was even told by a member of the department that they considered him to be "lawsuit scammer," and that he should otherwise "give up and let go" of the frivolous claims they thought he was trying to bring otherwise. This upset William greatly, considering that he knew for a fact that his claims were genuine, and that he had discovered irrefutable, unequivocally verifiable information that completely implicated Sergeant Giddings, and to which also fully exculpated him. He did not appreciate becoming the "scapegoat" to somebody else's wrongdoings.

Not convinced that all his avenues of relief were yet exhausted, William reported the fraud and corruption he had caught of Sergeant Giddings, the Larimer County District Attorney, and now the Fort Collins Police Internal Affairs Department, to higher members of the Fort Collins City Government. He eventually spoke with the Fort Collins City Attorney and its Assistant Chief Of Police. Unfortunately, during his discussions with them, he was met with the same intellectual dishonesty, complacency, and opposition. Even though by this point in time William had discovered (and shared with them) the City's 146 year old plat, and a picture of the actual survey pin he had since found in the ground – that even further conclusively substantiated the truly public nature of the publicly owned and maintained 100-foot right-of-way sidewalk at issue – they still refused to acknowledge any wrongdoing on the part of their officer, let alone that the boundary map used by him in William's trial was indeed not the correct one that should have been referred to. The City Attorney further failed to rectify the situation by convoluting it into something more

complicated than it actually was, by erroneously claiming that the whole thing was merely some non-genuine dispute over the “exact” right-of-way line (and that perhaps William was just trying to create a controversy where there otherwise was none) versus a more critical and genuine dispute over what the actual “published” boundaries of the park are in the first place, and to which are of truly paramount importance in determining whether or not William is actually guilty of the charges (or not). She also referred to the “rights” William had to a jury trial, and to file an appeal, and that if he was unsuccessful in defending himself, that there was nothing her office or the police department could otherwise do to help him. This determination, of course, flies in face of Rule 3.8(h) of The Colorado Bar Association Rules Of Professional Conduct, which specifically mandates that wrongful convictions be overturned when a prosecutor becomes aware of “clear and convincing” evidence of a defendant's innocence, as well as law enforcement's unquestionable obligation to hold police officers accountable when they commit crimes like perjury and offering false instruments for recording (all independent of any appellate process taken).

Ultimately, Fort Collins Police Officer Sean Giddings, and the Larimer County District Attorney who pushed his case, poisoned the court system with their lies and corruption, and violated the truth seeking function of the trial process. Then, their superiors, once informed of the situation, left William in “no man's land” through their own systematic denialism, discrimination, and defamation of him as guilty until (evidently never) proven innocent. Having been presented with issues quite extremely easy to figure out, it can only be said that all city and county government officials involved were just too busy lynching William as some sort of pro se, homeless, “lawsuit scammer,” to actually see that he was innocent. Without a doubt, their narcissism, elitism, image problem, cognitive dissonance, intellectual dishonesty, intellectual laziness, willful blindness, reckless disregard for the truth, sheer incompetence, and classist bigotry, have cumulatively rendered them wholly objectively unreasonable people, and otherwise requiring William to seek outside assistance at this point to overturn his wrongful conviction with.

**He humbly asks for your help now to finally right such a simple wrong that he just doesn't deserve to live with. He is looking at (or is already!) spending 72 days in jail over this issue, and with his severe and debilitating medical condition (a sliding duodenal hernia) he is deeply concerned that he may not fend well.**

**Please help William overturn his wrongful conviction! Thank you!**

**Change.org Petition: <http://chnng.it/PtL7vJmHqM>**

**Website w/ Links: <http://www.thetruthaboutoccupyjefferson.com>**

**YouTube Playlist: <http://www.youtube.com/playlist?list=PLjxRs72qy9z-13c5WYYTB3LciHyRyktwo>**

Also, William and his brother can always use more financial help to process this and their many other cases with, so if you can, please consider donating to their cause here: <http://www.gofundme.com/helpfightcopfraud>. Thank you!

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**FACTUAL BACKGROUND:**

**146 YEARS AGO, IN JANUARY OF 1873,** the City Of Fort Collins published **an official town plat** (see [Fort Collins Citydocs Original 146 Year Old Town Plat](#)) in order to delineate between predominantly rectangular-based parcels made for the sale and use of private property, and city-owned streets and alleys, or publicly maintained “rights-of-way” as they are commonly referred to, that would then serve to separate these privately-owned parcels into blocks or “tracts” of land in a standard grid-like fashion.

Today, the City's town plat is still available for public viewing down at the [City Of Fort Collins Survey Department](#), located at 281 N College Ave, as well as online via the City's internally-maintained online document portal, [citydocs.fcgov.com](#), and remains essentially unchanged since its inception, serving as a reference guide for contracts, leases, boundary maps, surveys, etc. and for other uses and benefits of the residents of the city and the city itself.

Also available in the city and online (via [it's published municipal code](#)) is **the legal definition of the “public right-of-way,”** which is used to accurately describe said city-owned street and sidewalk space located in between said privately-owned parcels. Read verbatim, the public right-of-way is defined as **“the entire area between property boundaries which is owned by a government, dedicated to public use, or impressed with an easement for public use, which is primarily used for pedestrian or vehicular travel, and which is publicly maintained, in whole or in part, and includes, but is not limited to the street, gutter, curb, shoulder, sidewalk, sidewalk area, parking or parking strip, median and any public way.”**

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**ON OCTOBER 25, 1995, a lease,** Audit No. OMA 6288 (see [Jefferson Street Park Original Lease From The Union Pacific Railroad Company](#)), was entered into between the [Union Pacific Railroad Company](#), the private property owner of a predominantly rectangular-shaped parcel of land they owned located in the Northwest Quarter of Section 12, Township 7 North, Range 69 West of the 6th P.M. (the northeast corner of Linden Street and Jefferson Street), and the City Of Fort Collins – to be used, per the lease agreement, as *“a public park (Jefferson Street Park) and parking and purposes incidental thereto, only, and for no other purpose.”*

On page three of this contract, which is still currently available down at the City Of Fort Collins Real Estate Office, located at 300 La Porte Ave, Building B, **there exists a black and white drawing / visual representation of the clearly established, rectangular-based boundaries of the newly-leased city park** (see [Page Three Of The Jefferson Street Park Original Lease](#)).

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**ON INFORMATION AND BELIEF, SOMETIME AFTER OCTOBER 25, 1995 AND BEFORE SEPTEMBER 2015,** an employee of the City Of Fort Collins GIS Department, located at 218 N Mason St, authored a park boundary map (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Pre 2016\)](#)) for Jefferson Street Park, for use within their department and for distribution to other city departments and to the public in general via their physical office and website portal, [gisweb.fcgov.com](#).

**This park boundary map, and its accompanying digitally-stored “polygon file,” however, contained a discrepancy in it, whereby an adjacent railroad track area located directly to the east of the park, and a northeast parking lot located directly to the northeast of that, were erroneously and mistakenly included in it, but to which were not actually part of the “true” boundaries of the**

originally-established Jefferson Street Park as drawn up in the agreed upon lease entered into between the Union Pacific Railroad Company and the City Of Fort Collins on October 25, 1995.

On information and belief, this Jefferson Street Park GIS Department boundary map discrepancy remained unnoticed and uncorrected for several years, as evidenced by other city departments having imported its associated incorrectly-drawn polygon file into their departments, and then subsequently republishing the same incorrectly-drawn boundary map of the park for use within their own departments and for further distribution to the public in general via their physical offices and website portals.

On information and belief, there are at least two known other city departments that had imported said GIS-Department-based, incorrectly-drawn, discrepancy-laden, boundary map polygon file of Jefferson Street Park into their department – the City Of Fort Collins Natural Areas Department (see [Fort Collins Natural Areas Website Official Boundary Map Of Gustav Swanson Natural Area](#)), and the City Of Fort Collins Parks Department.

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The City Of Fort Collins Parks Department, located at 413 S Bryan Ave, employs a Parks Department Life Cycle Coordinator to produce internal-use-only, maintenance-based maps of city parks that are created for service-related needs only, and whereby are oftentimes redrawn internally to join adjacent service areas with, and to which extend out to, “butt up” to, and follow along curb lines of nearby publicly owned and maintained rights-of-way, for instance, so as to include these other areas of service within them that are not necessarily included in the official boundaries of the nearby parks to which the Parks Department is tasked with maintaining, but to which help their rangers and other city employees have an easier time knowing what their service responsibilities are, such as servicing “tree longs” located in these nearby rights-of-way, or to establish which nearby trash cans located just outside said parks are their job to empty.

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**ON INFORMATION AND BELIEF, SOMETIME AFTER OCTOBER 2013 AND BEFORE SEPTEMBER 2015,** the Fort Collins Parks Department Life Cycle Coordinator, Jill Wuertz, imported said GIS Department's incorrectly-drawn, discrepancy-laden, boundary map polygon file of Jefferson Street Park into her internal department during the production period of the Parks Department's internal-use-only, service-related, maintenance-based map of Jefferson Street Park to be used exclusively by her park rangers and other city employees to service and maintain the park and its surrounding areas with.

And, on information and belief, after viewing the GIS-Department-imported, incorrectly-drawn, discrepancy-laden, boundary map polygon file of Jefferson Street Park, Jill Wuertz authored a more appropriate internal-use-only, service-related, maintenance-based “map” of the park to be used exclusively by her park rangers and other city employees to service and maintain the park and its surrounding areas with.

On information and belief, this new “map” (see [Internal Parks Department Maintenance Map Of Jefferson Street Park \(Red/Green\)](#)) that Jill Wuertz produced for internal-purposes-only thenceforward contained two distinct, merged, internally-maintained polygon files in it – red lines that represented the originally imported (but incorrectly-drawn) GIS-Department-based boundary map of Jefferson Street Park, and to which erroneously included within it its aforementioned not-legally-part-of-the-actual-official-park adjacent railroad track area and northeast parking lot discrepancies, and green lines that represented the new, internal-use-only, service-related, maintenance-based area of Jefferson Street Park, that more closely matched the original, official, lease-based boundaries of the park (but not quite) and to which was intended for exclusive use only by her park rangers and other city employees to service and maintain the park and its surrounding areas with, like the nearby rights-of-way to it.

On information and belief, these newly-drawn green lines of this red-and-green-line, internal-use-only, service-related, maintenance-based map of Jefferson Street Park were drawn up by Jill Wuertz to include the public sidewalk located just to the south and southeast of the park – known as the publicly owned and maintained right-of-way sidewalk of Linden Street. And, on information and belief, said green-line-colored, internal-use-only, service-related, maintenance-based area extended out to, “butted up” to, and followed along the curb line of this public sidewalk in order to allow her park rangers and other city employees to service and maintain, in addition to the park itself, this separately-paved, not-legally-part-of-the-actual-official-lease-based-boundaries-of-Jefferson-Street-Park, publicly owned and maintained right-of-way sidewalk of Linden Street.

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**DURING THE FIRST WEEK OF SEPTEMBER 2015,** members of the public began to congregate and protest in and around Jefferson Street Park in opposition to the unnecessarily high and further rising costs of living they had been experiencing, questionably-unconstitutional and arbitrarily-and-selectively-enforced municipal-based “anti-sleeping” ordinances like the three unrelated rule, camping, constructing a structure, park curfew, etc. they believed had been otherwise “human trafficking” them and other members of the public into more-expensive-than-necessary living conditions than they could afford – or else out of town, and the unfair, aggressive, malicious, and racially-motivated behavior they had been observing of police illegally targeting, arresting, and “hiding” homeless people for what they were seeing was no other reason than for being visibly poor and of a predominantly lower socio-economic status than most.

This protest, dubbed the “Occupy Jefferson Protest,” went on for several days, and at one point in time had as many as 30 people participating in it.

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**DURING THE FIRST WEEK OF THIS PROTEST,** multiple Fort Collins Police Department Officers visited Jefferson Street Park during nighttime hours, and had been giving verbal warnings to any Occupy Jefferson protesters who had been remaining in the park at night that they were in violation of the city's park curfew municipal ordinance, but that “discretion” was otherwise being exercised upon them by said officers to not ticket them just yet for their allegedly illegal behavior.

These warnings caused most of the protesters to move to a grassy area on the west side of a sidewalk that ran parallel to, and alongside Jefferson Street, which appeared to be outside of the park. The protesters wanted to continue to be able to have the right to protest indefinitely, but to not be in violation of the city's park curfew municipal ordinance otherwise.

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**ON INFORMATION AND BELIEF, DURING THE SECOND WEEK OF THIS PROTEST,** officers of the Fort Collins Police Department began to disagree over what the official boundaries of Jefferson Street Park actually were. The issue of boundaries had come up during the protest due to these remaining protest members repositioning themselves in this grassy area on the west side of the sidewalk that ran parallel to and alongside Jefferson Street.

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**ON INFORMATION AND BELIEF, BETWEEN SEPTEMBER 9, 2015 AND SEPTEMBER 12, 2015,** Sergeant Sean Giddings of the Fort Collins Police Department began investigating into the official boundaries of Jefferson Street Park. On information and belief, Sergeant Giddings then visited the City Of Fort Collins Parks Department to obtain a boundary map of the park for the purposes of enforcing the city's park curfew municipal ordinance with.

On information and belief, during his visit to the city's Parks Department, [Sergeant Giddings](#) spoke with, and requested a map of Jefferson Street Park from, [Fort Collins Parks Department Ranger Bud Bredehoft](#).

On information and belief, **Sergeant Giddings did not ask clarifying questions of Ranger Bredehoft during the obtaining of this Jefferson Street Park map, in order to determine if it was truly the “official” boundary map of the park, or not. But rather, on information and belief, Sergeant Giddings simply asked Bredehoft for “a copy of their map” – to which, on information and belief, Bredehoft provided to Sergeant Giddings whatever map they had on file, without otherwise inquiring himself as to why Sergeant Giddings needed such a map, or what it was going to be used for otherwise.**

On information and belief, the “map” that Sergeant Giddings obtained from Ranger Bud Bredehoft, via email, was the aforementioned red-and-green-line, internal-use-only, service-related, maintenance-based map of Jefferson Street Park that Jill Wuertz had previously authored and intended for exclusive use only by her park rangers and other city employees to service and maintain the park and its surrounding areas with.

This red-and-green-line “map” also did not notate on it any claims whatsoever that it was an “official” boundary map of Jefferson Street Park, nor did it contain any legends on it to delineate between what the red and green lines contained within it actually represented, either.

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**ON THE EVENING OF SEPTEMBER 12, 2015, AND/OR INTO THE EARLY MORNING OF SEPTEMBER 13, 2015,** [Sergeant Giddings](#) informed several members of the [Occupy Jefferson Protest](#) that he had evidently obtained “**the official park boundaries**” of Jefferson Street Park from what he likewise claimed was “**the official source for park boundaries,**” [the Fort Collins Parks Department](#).

**Sergeant Giddings informed the protesters that “the official park boundaries” of Jefferson Street Park went “curb to curb” and included within its ambit the adjacent Linden Street and Jefferson Street sidewalks to it.**

On information and belief, rather than inquiring and/or following up with the Parks Department regarding the factual discrepancies present (i.e. the lack of legend and what the red and green lines actually meant) within the red-and-green line “map” he had recently obtained from them, **Sergeant Giddings falsified and fabricated information to his fellow officers and to the protesters (and later to the court) that the green lines in said “map” was “the official boundary map” of the park, and that said “official” boundaries likewise extended “curb to curb” – all so that he could unlawfully target, arrest, and prosecute the few remaining protesters for their membership in the protest (and to thus, illusorily justify his perceived right to abruptly end said protest).**

William and David, both of which had not yet officially joined in on the protest (but who were nevertheless present nearby) overheard Sergeant Giddings' proclamation, while taking note of the fact that **said adjacent Linden Street and Jefferson Street sidewalks were, as far as they could tell, not clearly “designated and posted” as part of the park.**

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**ON THE AFTERNOON OF SEPTEMBER 13, 2015,** [William](#) visited [the City Of Fort Collins Right-Of-Way Services Department](#), located at 300 La Porte Ave, Building B.

There, he spoke with [two female employees](#) who informed him that [both the Linden Street and Jefferson Street sidewalks](#) in question were not actually part of Jefferson Street Park, and were otherwise considered “**public easements**” that did not close when the nearby park closed.



They also informed William that only in the event that such sidewalks are clearly “designated and posted” as closed by way of their own signs indicating such closures, would they ever be closed to access and use by the general public.

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**ON THE EVENING OF SEPTEMBER 13, 2015**, after passively watching on the sidelines for a few weeks, William and his brother David decided to officially join the Occupy Jefferson Protest themselves, as they too had been suffering from, and wanted to voice their opinions and concerns regarding, what they likewise believed was governmental oppression, discrimination, and retaliation against their national origin and lower socio-economic status as homeless people.

William and David had recently become homeless through no fault of their own after sustaining injuries on and off their previous jobs, and to which said previous work environments failed to adequately accommodate.

**They had also recently been frivolously (but unsuccessfully) sued by the City Of Fort Collins for allegedly violating their three unrelated rule, whereby just the two of them had been frivolously fined an astonishing amount of \$51,000 worth of municipal court fines, before their cases got dismissed by the city prosecutor on their way to trial, and after which they were still currently in the midst of preparing their counter-suits in the matter (see their [Two People In A Five Person House Get Fined \\$51,000 For Breaking A Three Unrelated Rule Playlist](#)).**

Before becoming homeless, William and David had been struggling to maintain jobs, housing, and vehicles ever since they had broken away from their Mormon family and heritage a decade or so prior, in their teenage years (see their [Double Brother, Ex Mormon, Joint And Several, Witness Tampered, Multiple Court, Life Racketeering Statement](#)).

**And so now, while newly homeless but still diligently working to resolve their prior medical and legal issues, they tried living in the city's shelters – but due to their differences in religious views, medical complications, and minimum sleep requirements, they found the shelters to be wholly inadequate to fulfill their basic needs. This otherwise required them to find alternative ways and places to sleep, oftentimes forcing them to sleep outside, “on the streets,” and to even leave town at times in order to avoid breaking the city's multitude of “anti-sleeping” related ordinances that were currently on the books.**

And so, due to the sheer fraud and corruption that they had been experiencing, as well as the complete lack of help provided to them by their estranged family, friends, and their hometown city at large, it was only natural for them to end up in a protest exercising their free speech right to “get back on their feet the right way,” and to be able to do so without being discriminated and retaliated against, and otherwise extorted into more-expensive-than-necessary costs of living than they were currently able to afford to pay in their present state and condition.

When William and David joined the protest, they did not bring any of their personal belongings with them into Jefferson Street Park. **At the time, they only walked up and down the sidewalks of Jefferson Street and Linden Street – both of which they had just been told by city officials were not part of the nearby park, nor presently closed due to their own clear lack of “designation and postedness” as closed therein.**

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**ON SEPTEMBER 14, 2015, AT 2:24AM**, Sergeant Sean Giddings, and Officers Matthew Brede, Matthew Brough, Mark Cutter, Bryan Grosshans, and Rick Mainwal, all uninformed members of the Fort Collins Police Department, approached, surrounded, seized, detained, and non-custodially arrested several members of the Occupy Jefferson Protest for allegedly being in the park during the hours that it was closed.

William happened to have been walking up and down the public sidewalk of Jefferson Street when this happened, and so was thereby detained and cited by Sergeant Giddings for allegedly violating the city's municipal park curfew ordinance at issue (see [William Gets False Arrested For Allegedly Being In A Park During A Protest](#)).

While issuing William a citation, Sergeant Giddings once again informed members of the Occupy Jefferson Protest that he had recently obtained from the City Parks Department what he claimed were “the official boundaries” of Jefferson Street Park.

**This time he showed some members of the protest a PDF document on his cell phone of the red-and-green-line, service-related, maintenance-based, otherwise intended for internal-use-only “map” of Jefferson Street Park that he had recently obtained from the Parks Department via email.**

First, Sergeant Giddings engaged in a lengthy debate with William over what the official boundaries of Jefferson Street Park purportedly were, versus the lack of proper designation and postedness of the publicly owned and maintained right-of-way sidewalk of Linden Street that he and his brother had been standing on, of which was captured on video using his police-issued body camera.

Following are direct quotes taken from Sergeant Giddings' bodycam footage of the conversations that took place between Sergeant Giddings, William, his brother, and other members of the protest regarding the purported boundaries of Jefferson Street Park and its purported inclusion of the nearby Linden Street sidewalk located adjacent to, and running alongside, the southern portion of it:

**GIDDINGS:** ***“The park boundaries include the sidewalks.”***

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**WILLIAM:** *“What am I supposed to do when I was told by people superior to you? You guys all work for us. I went and talked to my own city officials... and got straight to the word, straight to the horses mouth, and I was literally told that on this exact actual right-of-way, that I had the right of way to walk, at all times of the day.”*

**GIDDINGS:** ***“You don't. This is in the park. This area is closed.”***

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**GIDDINGS:** ***“We have maps of the boundaries of the park which include these sidewalks.”***

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**GIDDINGS:** ***“We have maps that show us that the boundaries go all the way to the street.”***

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**GIDDINGS:** ***“Well our, our city attorneys, have said that this is not an easement.”***

**WILLIAM:** *“That the actual sidewalk is not an easement?”*

**GIDDINGS:** ***“Yep. It is not an easement. These are within the boundaries, and are Jefferson Park.”***

**WILLIAM:** *“You are literally telling me that I am not allowed to walk on this easement 24 hours a day? Because I need to get from this point to that point, and not walk on the street!”*

**GIDDINGS:** ***“You cannot be in Jefferson Park from 11pm to 5am.”***

**WILLIAM:** *“How am I supposed to get from there to there guys?”*

**GIDDINGS:** *“Walk across that street, and then cross over.”*

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**GIDDINGS:** *“The park boundaries go to the street.”*

- - -

**GIDDINGS:** *“This is the park, all the way to the street.”*

- - -

**GIDDINGS:** *“This is not an easement.”*

- - -

**GIDDINGS:** *“Unfortunately this is not an easement. That has already been examined by our City Attorney’s office. And it’s not.”*

- - -

**GIDDINGS:** *“It’s park all the way to the street.”*

- - -

**GIDDINGS:** *“It’s not like you got a ticket just ‘cause you happen to be moving up this sidewalk right now, on your way to go home from one location to another. You would not, you would not likely get a ticket for that.”*

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**GIDDINGS:** *“But once we confirmed the boundaries of the park, we came and we warned them in advance that they were within the park.”*

- - -

**GIDDINGS:** *“Once we confirmed the boundaries of the park we gave them an opportunity to leave.”*

- - -

**GIDDINGS:** *“Once we had a continual problem here, that’s when we have to look and confirm the boundaries of the park so that we can address what the problem is. Once we confirmed that the boundaries of the park go all the way to the street, we came and gave them plenty of advanced opportunity to leave, just in case they did get bad advice that they were outside the park over there, we told them, this is still the park, you must leave.”*

- - -

**GIDDINGS:** *“It’s not because we’re trying to trick them and we’ve changed the boundaries, this is what the boundaries are, that’s why they are being charged.”*

- - -

And eventually, after the conversation with William ended, [Sergeant Giddings](#) pulled out his cell phone and finally showed [a different member of the protest](#) the actual PDF document of [the red-and-green-line "map"](#) that he had recently obtained from [the Parks Department](#). During this particular conversation, Sergeant Giddings said to the other protest member:

**GIDDINGS:** ***"See the green line, that's the boundaries of the park. Okay? See how it goes all the way out to the street. These are the official boundaries of the park."***

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**GIDDINGS:** ***"This is the official map of the park. Okay? That's the official. It is."***

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**ON THE AFTERNOON OF SEPTEMBER 14, 2015,** [William](#) called [the City Of Fort Collins Streets Department](#), located at 625 9th St.

He was informed by [a couple of female employees](#) that worked there that [the Linden Street northerly-running sidewalk](#) that butts up to Jefferson Street Park was part of the publicly owned and maintained 100-foot right-of-way of Linden Street – and was not, in any way, shape, or form, associated with or part of the nearby Jefferson Street Park, whatsoever.

[The ladies also informed William, just like the ladies at the Right-Of-Way Services Department did, that any official closures to the public sidewalk in question, as well as to any other public sidewalks within the city, were required to have properly "designated and posted" signs of their own placed on them in order to be lawfully closed to access and use by the general public – and as such, if the publicly owned and maintained right-of-way sidewalk of Linden Street at present issue did not currently have a properly "designated and posted" sign on it indicating that it was closed to the public \(which it didn't\) that it was not currently, actually, officially closed to the public \(which it wasn't\).](#)

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**ON THE EVENING OF SEPTEMBER 14, 2015,** [all remaining members of the Occupy Jefferson Protest](#) relocated themselves and some of their belongings away from [the west side of the public sidewalk](#) that ran parallel to and alongside Jefferson Street, and into [the publicly owned and maintained right-of-way sidewalk](#) that ran along the northerly side of Linden Street.

Even though William had recently been informed by [the ladies over at the City's Right-Of-Way Services Department](#) that [the Jefferson Street sidewalk](#) (and likely the grassy area located between it and the adjacent public street) was legally considered a "public easement" that did not otherwise close when the nearby park closed, he and the other protesters figured it would be safer and even less controversial for them to relocate themselves to the more obvious, [fully publicly owned and maintained right-of-way sidewalk of Linden Street](#), so as to have an even easier time fighting any unlawful tickets they might potentially be given in the future, should the police otherwise continue their efforts to end their protest by citing them.

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**ON SEPTEMBER 15, 2015, AT 2:00AM,** [Sergeant Sean Giddings, and Officers Matthew Brede, Matthew Brough, Mark Cutter, Bryan Grosshans, and Rick Mainwal, all uninformed members of the Fort Collins Police Department,](#) approached, surrounded, and detained the few remaining members of [the Occupy Jefferson Protest](#). The Officers informed the protesters that they were all in violation of the city's park curfew municipal ordinance for allegedly being within the boundaries of Jefferson Street Park

between the hours of 11pm and 5am, and that they were all being arrested and cited into municipal court for their purportedly illegal behavior.

**At the time the Officers surrounded William and David, they were both physically located exclusively on the publicly owned and maintained right-of-way sidewalk of Linden Street, facing northeast, and had been standing only within the green lines of the Park's Department's red-and-green-line, internal-use-only, service-related, maintenance-based "map" of Jefferson Street Park that had been extended out to, "butted up" to, and to which followed along the curb line of the publicly owned and maintained right-of-way sidewalk of Linden Street. Neither William, nor his brother, had ever been standing, by any means whatsoever, within the red lines of that same red-and-green-line, internal-use-only, service-related, maintenance-based "map" of Jefferson Street Park.**

Also at the time the Officers surrounded William and David, **the only sign nearby** that would have potentially served as proper "designation and postedness" that the area they were standing within was otherwise Jefferson Street Park and to which was otherwise closed after hours, **was a sign located several feet in front of David**, about twelve feet forward (see [Photograph Of The Jefferson Street Park Entrance](#)), and otherwise posted six feet behind a sculpturesque fence that separated the grassy area of the park from the separately-paved, publicly owned and maintained right-of-way sidewalk of Linden Street that they had been standing on, and to which faced south so as to inform people entering the park from the northeast corner of the intersection that they would otherwise be entering the park once they moved past the sculpturesque fence and into the grassy area. **This sign was clearly and inconspicuously posted a full six feet behind the sculpturesque fence, and not by any means in front of it, nor anywhere else on the separately-paved, publicly owned and maintained right-of-way sidewalk of Linden Street to which they had both been standing on. It was located well within the grassy area of the nearby Jefferson Street Park.**

**The publicly owned and maintained right-of-way sidewalk of Linden Street** that William and David stood upon had also been paved using the same construction standards and styles in mind as the other public sidewalks that run alongside Linden Street on both its northern and southern borders (see [Several Surrounding Linden Street Right Of Way Sidewalks](#)). **These public sidewalks all equally contain identically constructed and styled planter boxes, concrete benches, and trash receptacles, all of which are wholly different in standard and style from the benches and trash receptacles located inside of the official boundaries of Jefferson Street Park.** The back ends of these public sidewalks also run consistent with the city's 100-foot-wide established right-of-way of Linden Street, that consistently runs all the way up and down the street, as originally laid out in the city's town plat released and unchanged from 146 years prior.

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**ON SEPTEMBER 15, 2015, JUST AFTER 2:00AM, Sergeant Giddings conversed with Officer Brede, and instructed him to seize, detain, and non-custodially arrest David Montgomery for allegedly violating Fort Collins Municipal Code 23-203(d)(1) – "Entering A Recreation Area During The Hours Of 11:00 p.m. To 5:00 a.m"** (see [David Gets False Arrested For Allegedly Being In A Park During A Protest](#)). Shortly thereafter, **Sergeant Giddings instructed Officer Grosshans to seize, detain, and non-custodially arrest William Montgomery for allegedly violating Colorado Revised Statutes § 18-9-117 – Unlawful Conduct On Public Property**, a similar, state-based charge that can be given for certain "repeat" municipal code violations, **but whereby its correlative underlying municipal code elements are still required to be used in order to have probable cause to lawfully arrest and possibly convict people over, thus requiring William to have still been within the boundaries of a clearly "designated and posted" as closed city park in order for such charges to stand in court otherwise** (see [William Gets A County UC Charge For Allegedly Being In A Park During A Protest](#)).

Despite being completely innocent of the crimes alleged, **William and David** were then demanded by **Officers Grosshans and Brede** to provide their identification, and to which they voluntarily did so accordingly, so that they could be cited into court for allegedly violating the city's park curfew municipal ordinance and its correlative state-based statute at issue.

Throughout the encounter, **William and David informed the Officers** that they believed they were innocent of the crimes alleged, that they had recently spoken with city officials regarding the matter, and that the publicly owned and maintained right-of-way sidewalk of Linden Street to which they had been standing on was not part of the nearby park, not designated and posted as closed, and therefore lawfully presently open to the general use of the public at all times, and to which they were otherwise completely and lawfully allowed to stand upon, indefinitely, regardless of any purported boundary maps that the police department had obtained and were attempting to use to remove them from some alleged park boundaries with.

In [Officer Grosshans' police report](#), he notated that “around 0217 hours, I came in contact with William Montgomery who was found in the park in violation of the park rules and regulations. I issued him a summons for Unlawful Conduct on Public Property. Mr. Montgomery was told he needed to remain off the grounds until the park opened.” In [Officer Brede's police report](#), he notated that he “was asked by Sgt. Giddings to issue a summons to David Montgomery. Montgomery was in the park after hours, as the park is clearly signed 'closed between the hours of 11 PM and 5 AM.’”

**Submitting this information in their police reports was a reckless and malicious factual fabrication and embellishment of the truth, however, as the strip of land that William and David had been standing on was most definitely not “clearly signed closed between the hours of 11 PM and 5 AM.’”**

In fact, as mentioned before, there were no signs of any kind located directly on or reasonably near enough to the publicly owned and maintained right-of-way sidewalk of Linden Street that William and David had been standing on, that would have clearly and unambiguously indicated to them (or anybody else) that it was, in fact, part of Jefferson Street Park, and thus, closed to the public between the hours of 11pm and 5am – and for good reason too, **as the particular public sidewalk in question was not actually legally part of the nearby city park in the first place, it was exclusively part of the 100-foot wide publicly owned and maintained right-of-way known as Linden Street.**

**The nearby Jefferson Street Park sign was never erroneously placed**, as the police may perhaps try to argue when otherwise comparing it to Sergeant Giddings' purportedly-legitimate boundary map, **it had been placed exactly where it was supposed to be located – at the entrance to a park whose boundaries started behind a sculpturesque fence running along the back end of a publicly owned and maintained right-of-way sidewalk known as Linden Street.** The internal-use-only, service-related, maintenance-based “map” that Sergeant Giddings carelessly, erroneously, and unlawfully obtained from the Parks Department was the true source of any and all discrepancies regarding the actual “official” boundaries of Jefferson Street Park. Indeed, a rational, prudent, reasonable police officer would have actually taken the physical location of the park closure sign at issue, and would have compared it to the red-and-green-line “map” at issue, and would have actually found good cause to do the exact opposite of what Sergeant Giddings did – which would have been to, rather than prematurely ticket the purported “controversy” directly into court with some sort of purportedly-legitimate, but-not-actually-complete-and-otherwise-non-existent claim of probable cause, instead take the necessary steps to recontact and follow up with the original department to which the map had initially been obtained from, first, before deciding to ticket anybody, in order to complete the necessary, new investigation at hand (but still related to the original, still-open, principal investigation that spurred it) into, now, why the green-line-only-based area of the “map” in question is evidently not properly “designated and posted” as closed when it would otherwise need to be, according to the provided document – which would have, in turn, allowed the reasonable officer to actually discover that the “map” to which he had originally been provided was actually, in fact, an internal-use-only, service-related, maintenance-based map – and not an actual “official” park boundary map at all!

**Essentially, Officers of the Fort Collins Police Department were supposed to have drawn the lawful justification for their actions from the original and critical park curfew municipal ordinance elements of “designation and postedness” only – and not from some arbitrarily, erroneously, carelessly, and unlawfully obtained “map” simply given to them by some city department.**

It may also appear, at first glance, that **Officer Brede** had at least been referring to and depending on his critical park curfew violation elements of “designation and postedness” by mentioning them in his police report of the incident. However, what he said later, after issuing David’s citation, that his own bodycam footage captured no less (see [Conversation Between Officers Mainwal And Brede](#)), seemingly contradicted such things, and otherwise revealed the truth that **he, too, had been primarily referring to and exclusively depending on the falsified and fabricated as “official” red-and-green-line, internal-use-only, service-related, maintenance-based “map” that Sergeant Giddings had obtained from the likewise falsified and fabricated as “official” Parks Department, rather than on the critical elements necessary to have probable cause with of “designation and postedness.”** Officer Brede’s body camera captured Fort Collins Police Officer Mainwal making a statement later to him regarding the interaction still going on between Sergeant Giddings and William, whereby Officer Mainwal said to him, *“He’s just showing him a picture of the map,”* and to which Officer Brede responded haughtily by saying *“Didn’t work?”* and then bursting out in laughter.

Once Officers Grosshans and Brede finished citing William and David, they instructed and required them to leave the publicly owned and maintained right-of-way sidewalk of Linden Street that they were otherwise completely and lawfully standing on, and to exit the alleged Jefferson Street Park boundaries to which the Officers had erroneously and unlawfully claimed they were not allowed to be within.

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**DURING THE PROTEST AND AFTER IT ENDED**, and after **each protester** involved had been arrested, and/or cited, and removed from the purported Jefferson Street Park boundaries, **multiple Officers drafted police reports that included false and misrepresentative information regarding the purported “official” nature of the boundary map that Sergeant Giddings had obtained from the purportedly “official” city department to which he had obtained it from**, and whereby such falsified and fabricated facts were used to substantiate that William, David, and the other protesters had otherwise been lawfully detained, was likewise meant to cover up and conceal their own abuse of authority, and was intended to continue to punish and retaliate against them for what the Officers had perceived was a challenge to their authority and annoyance of speech of the now-silenced protesters.

On information and belief, **the city prosecutor** communicated with **said Officers** leading up to the trial, through in-person meetings and via email, as is typical of cases involving police complaining witnesses. On information and belief, **all Officers involved continued to assert falsified and fabricated facts regarding the purported “official” nature of the boundary map and the purportedly “official” city department to which it had been obtained from, in order to otherwise support the protesters’ continued criminal prosecutions through false assertions that they had witnessed, in person, the park curfew violations that they had allegedly committed.**

Even though **all Officers involved** had full access to that night, as well as throughout the entire pre-trial phase of William’s and David’s cases, **the critical “designated and posted” elements of their city’s park curfew municipal ordinance** (which doesn’t refer, whatsoever, to the use of maps, by the way) **the Officers continued to maintain that they were legally justified in their actions, and that William, David, and the other protesters had been in violation of their city’s park curfew municipal ordinance.** On information and belief, all Officers involved continued to exclusively rely on **the falsified and fabricated as “official” red-and-green-line, internal-use-only, service-related, maintenance-based “map” that Sergeant Giddings had erroneously, carelessly, and unlawfully obtained from the likewise falsified and fabricated as “official” source for park boundaries**, the Fort Collins Parks Department.

In fact, via **their patrol maps** and online access to [gisweb.fcgov.com](http://gisweb.fcgov.com), both being directly located on and accessible via **their laptops in their patrol vehicles** before, during, and after each protester’s arrest, **all Officers involved likewise had perpetual access to, but failed to utilize, the “more correct” original GIS Department boundaries** that reflected the purely public nature at issue of the publicly owned and maintained right-of-way sidewalk of Linden Street that William, his brother, and the other protesters had been standing on. **They could have easily resolved the conflict at hand both that very night, and**

**long before trial, but otherwise – for one reason or another – consciously chose not to, and/or recklessly disregarded the truth in order not to.**

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**ON OCTOBER 26, 2015, a quitclaim deed** (see [Union Pacific Railroad Company Quitclaim Deed To LSH, LLC](#)) was executed into the Larimer County Court by [the Union Pacific Railroad Company](#), which transferred ownership of its property (the property it originally leased to Fort Collins to be utilized as Jefferson Street Park) to [Linden Street Holdings, LLC](#). Consequently, the lease for the park naturally transferred hands as well, and was now an agreement maintained between said Linden Street Holdings, LLC, and The City Of Fort Collins, and whereby said park was to remain such a park, until further notice otherwise.

Interestingly, on page seven of this quitclaim deed, there exists **a map** for the area in question, **and within which, of course, the property lines at issue match up exactly with the lease-based property lines / official Jefferson Street Park boundary lines as originally established in the lease for the property back on October 25, 1995** (see [Page Seven Of The UPRC Quitclaim Deed](#)).

Then, **ON OCTOBER 30, 2015, a certified letter** was mailed to [Fort Collins City Manager Darrin Atteberry](#), explaining the aforementioned transfer of ownership that had just occurred (see [Letter To The Fort Collins City Manager Regarding Lease Transfer](#)).

Also, just as before, **a map** can be found on page three of this document, **which further matches up exactly with the now several accurate maps that have been drawn up for the property at issue** (see [Page Three Of The Certified Mail Letter](#)).

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**ON DECEMBER, 15, 2015, AT 2:56PM,** [William and David](#) visited [the City Of Fort Collins Parks Department](#), located at 413 S Bryan Ave, and spoke at great length with [Director Of Parks Mike Calhoon](#) (see [Visit With Mike Calhoon \(Head Of Parks Department\)](#)). The three of them discussed everything that could practically be discussed about right of ways, Jefferson Street Park, leases, fences, designation and postedness, maps, municipal code ordinances, etc. **During their conversation, Mike referred them to the City Of Fort Collins website when they asked him if he had a map of Jefferson Street Park available for viewing.**

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**ON JANUARY, 27, 2016, AT 12:37PM,** [William and David](#) attended **a pretrial conference** with [Fort Collins Municipal Court Assistant City Attorney Robert Fink](#) (see [Visit With Robert Fink \(City Attorney\) Regarding Jefferson Street Park](#)). **While there, they pleaded their innocence, explaining to him that they had checked with multiple city departments regarding the public property nature of the Linden Street sidewalk at issue and the fact that it was not actually part of Jefferson Street Park, that they were unable to get a hold of the red-and-green-line map that Sergeant Giddings had obtained from the Parks Department during the Occupy Jefferson Protest, and that they had otherwise, at the very least, obtained (and showed him) an original City Of Fort Collins GIS Department map of the park that they had recently found online** (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Pre 2016\)](#)).

**This information alone – an official GIS department map of Jefferson Street Park – would have been enough for City Prosecutor Fink to drop the charges currently levied by his city against David and William, had he been a cautious, prudent, and objectively reasonable custodian of the law otherwise.**



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**ON FEBRUARY 3, 2016, AT 11:27AM,** William and David visited the City Of Fort Collins GIS Department, located at 215 N Mason St, Third Floor, and spoke with Senior GIS Programmer Doug Cane (see [Visit With Doug Cain \(Senior GIS Programmer\)](#)). During their discussion about rights of way versus park boundaries (and how to ascertain the precise boundary lines of Jefferson Street Park), **Doug referred William and David to Larimer County's mapping and parcel/records departments, the City Of Fort Collins Streets Department, and the City Of Fort Collins Survey Department.**

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**ON FEBRUARY 3, 2016, AT 12:25PM,** William and David visited the City Of Fort Collins Streets Department, located at 625 9th St (see [Visit With The Ladies At The Streets Department](#)). There, they spoke once again with the ladies that worked there, and this time requested that they be given something – anything – by them, in writing, that would better substantiate and clarify that the Linden Street northerly-running sidewalk that butts up to Jefferson Street Park is, in fact, part of the publicly owned and maintained 100-foot right-of-way of Linden Street (and not, in any way, shape, or form, associated with or part of the nearby Jefferson Street Park) as they had previously stated to them back in September of 2015, during the protest. **They were told that a document would soon be prepared for them.**

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**ON FEBRUARY 3, 2016,** William filed a Motion To Dismiss in his Unlawful Conduct On Public Property case (see [William Files A Motion To Dismiss In County Court For His Unlawful Conduct Charge](#)). **In his motion, William thoroughly explained that he was unlawfully cited by Officer Grosshans while standing within the publicly owned and maintained 100-foot right-of-way of Linden Street.** He offered, via several exhibits, multiple objectively reasonable and easily obtainable public documents that conclusively substantiated his position, including a Fort Collins GIS Department map of Jefferson Street Park (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Pre 2016\)](#)), a D.O.T. Railroad Construction Project blueprint document for the area (see [Fort Collins Citydocs Right Of Way Map \(Railroad Project Blueprints\)](#)), and a proposed Linden Street Parking Lot blueprint for the area (see [Fort Collins Citydocs Right Of Way Map \(Proposed Linden Street Parking Lot\)](#)), **all of which revealed, without a doubt, that neither he, nor his brother, could possibly have been in violation of being within the nearby Jefferson Street Park's boundaries, that morning of September 15, 2015.**

**This is officially the first moment in time that the Larimer County District Attorney's office had conclusive, objectively reasonable information within its possession, that a publicly owned and maintained 100-foot right-of-way existed along Linden Street, that it could have then cross referenced and compared with any and all maps and plats available for the area, and that whereby had they viewed such information through an objectively reasonable, presumed-innocent-until-proven-guilty lens, they would have easily been able to conclude that William and David were not guilty of the crimes alleged (and would have thus dropped William's charges immediately therein). Suffice it to say, they just could not put their pitchforks down, and continued to press onwards with their malicious prosecution nonetheless...**

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**ON FEBRUARY 4, 2016, AT 12:34PM,** William once again visited the City Of Fort Collins Streets Department, in order to follow up with the ladies that worked there and hopefully obtain the document that he had just requested from them (see [Follow Up Visit With The Ladies At The Streets Department](#)). **Sure**

enough, Mallory Gallegos was able to provide him with roughly the type of document that he was looking for – a reference to Larimer County's parcel-based mapping platform, and an included map she even pulled from it, that showed the exact parcel / right-of-way lines of the area in question (and to which of course, ran 100% consistent with the City's 146 year old plat, as well as its GIS-Department-based map of the nearby Jefferson Street Park) (see [Linden Street Sidewalk Right Of Way Statement Provided By Mallory Gallegos \(Streets\)](#)).

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**ON FEBRUARY 18, 2016**, Assistant Larimer County District Attorney Laurie Dean responded to William's motion to dismiss in his Unlawful Conduct On Public Property case (see [The Larimer County Deputy DA Laurie Dean Responds To William's Motion To Dismiss](#)). She advocated that his motion be denied because of her belief that his issues should only be raised at trial, that a judge doesn't have the power to dismiss his case, and that he doesn't otherwise deserve a preliminary hearing in the matter.

**Of course, none of what she said precluded her from being able to independently investigate into the exculpatory information that had now been provided to her office by William, starting a new conversation with the City Of Fort Collins regarding the obvious contradictions now present between the information provided to her by William and the information provided to her by Sergeant Giddings, and otherwise still fully conclude, without having to go to trial, that William was fully innocent of the charge levied therein.** (Oh how the District Attorney could have saved so much time and trouble had it simply put its pitchfork down, and picked up a plat instead!)

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**ON FEBRUARY 25, 2016**, the Larimer County Court Judge Kraig Ecton denied William's motion to dismiss in his Unlawful Conduct On Public Property case (see [County Court Judge Kraig Ecton Denies William's Motion To Dismiss](#)).

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**ON MARCH 17, 2016, AT 2:20PM**, David stood trial at the Fort Collins Municipal Courthouse, located at 215 N Mason St, for his Occupy Jefferson Protest city park curfew municipal violation (see [The Fort Collins Police Lose Their Park Curfew Municipal Trial Against David](#)).

**At David's trial, Sergeant Giddings submitted to the Court, and testified to it's purported "officialness" and authenticity, the red-and-green-line, internal-use-only, maintenance-based, service-related "map" that he had obtained from what he likewise continued to claim was the "official source for park boundaries" within the city, the Fort Collins Parks Department. Sergeant Giddings claimed that on September 15, 2015, he instructed Fort Collins Police Officer Matthew Brede to cite David for violating the city's park curfew municipal ordinance for being within the green lines of that red-and-green-line map, but not the red lines, between the hours of 11pm and 5am when that area was purportedly closed. Then, Officer Brede was put on the stand, whereby he testified to the exact same contextual circumstances.**

**Come David's defense, he also submitted to the Court a map – the official GIS department boundary map of Jefferson Street Park (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Pre 2016\)](#)) that his brother had found online, via [gisweb.fcgov.com](#). While this map did contain the aforementioned erroneously-included railroad track area and northeast parking lot discrepancies in it when compared to the original, most-correct, truly-official, lease-based boundaries of the park, it nevertheless still accurately reflected the purely public nature of the publicly owned and**

**maintained 100-foot right-of-way sidewalk of Linden Street** that he had been completely legally standing on that morning of September 15, 2015.

And so, after receiving and reviewing all the evidence and testimony presented to her, **Judge Kathleen Lane found David not guilty of the charges**. In clear and unambiguous language, she described the controversy well, and how he deserved to be found not guilty of being in a park after hours, by stating, in part:

**JUDGE LANE:** *“We don’t have anyone from the parks department here to testify, and there is no legend on this, umm, diagram here to indicate what the red means or the green means. **But that’s the officer’s testimony.**”*

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**JUDGE LANE:** *“So he indicates that his, uhh, his brother’s research, uhh, brought him to these various maps which he’s, uhh, admitted. Uhh, exhibit B-1, **which indicates that it is from the City of Fort Collins GIS system**, which is what his testimony was, uhh, shows a, a grayed area, and I apologize you probably can’t really see what I’m pointing to but I’ll try anyway, uhh, **but the area that’s labeled Jefferson Street Park, this lighter gray area, uhh, actually appears to match more closely the red line in the city’s, uhh, diagram.**”*

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**JUDGE LANE:** *“There was no testimony about how this park is signed in terms of where any signage is about, this is Jefferson Park, or whether there are any signs showing boundaries or not. Uhh, the only indication about signage is on this, uhh, document. It does show that, that, there is a no alcohol in the park sign, which appears to be inside the park, on the, so that would be north of the sidewalk.”*

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**JUDGE LANE:** *“And again, they, the eastern edge of that project boundary matches the red line on this, uhh, city exhibit. It does not go all the way out to, uhh, the more rounded edge of the sidewalk as the green line.”*

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**JUDGE LANE:** *“The prosecution didn’t dispute the fact that where the defendant was standing was in this area that’s within the green lines but not within the red line. Umm, on the sidewalk on the east side, uhh, and in fact, uhh, between the east edge of the sidewalk and the street, essentially, the curb area there, with his bike.”*

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**JUDGE LANE:** *“So, uhh, based on all of that, uhh, I am going to find the defendant not guilty, and find that there is a reasonable doubt about whether he was within the park boundary. Uhh, and I understand that this area is, umm, in redevelopment stage, and I’m not sure what the current status is, but, umm, in order to enforce that curfew violation, that the, **what the code requires, is that, it’s an area that is designated and posted as a park.** Umm, and so I’m going to find that the sidewalk area that the defendant was in was not clearly designated and posted as part of Jefferson Park, and there is a reasonable doubt about that. So, I’m going to find you not guilty.”*

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**ON APRIL 5, 2016**, [Fort Collins Police Officer Josh Golden](#) was dispatched by [his superior officer](#) to investigate into some of [William's concerns](#) (see [Officer Golden Investigates Into William's Map Discrepancy Allegations \(But Fails!\)](#)). This investigation was likely triggered by [the Larimer County District Attorney's office](#) after William briefly spoke with them in court one day. Essentially, Officer Golden spoke with several city employees regarding prior interactions they may have had with William.

## **Unfortunately, the investigation was a complete**

**failure.** This is likely because of the growing “guilty until proven innocent” mentality that seems to be so prevalent now in today’s society. To begin with, when asked about what conclusions they reached with William, **each city employee said things like “we told him that we could not say for sure where the boundary was without a survey.”** Very important here, however, is that **it appears that these city employees were each assuming the dispute at hand was over where the exact right-of-way line itself was, that butts up to Jefferson Street Park (which would indeed require a survey to know precisely, for sure, where it actually lies) versus a more obvious and general dispute that may otherwise exist with regards to simply what the published boundaries of Jefferson Street Park were in the first place.** Basically, each employee likely assumed that the police officer they were speaking with was naturally referencing the same park boundaries that they were familiar with. Because Officer Golden never actually brought with him the controversial red-and-green-line map obtained by Sergeant Giddings that one day from the Parks Department, each city employee likely assumed, but incorrectly, that the controversy at hand must have been over exact survey lines only, and not possibly over the outright incorrectly drawn boundary lines of Jefferson Street Park in the first place. **One can only imagine that when they all talked about the adjacent right-of-way line, each city employee was referencing, in their minds, what were otherwise the correct, GIS Department boundary lines of Jefferson Street Park, completely unbeknownst to Officer Golden, all while Officer Golden was referencing, in his mind, what he thought were the correct boundary lines of the park, but were actually from the totally differently drawn boundaries that were instead sourced from Sergeant Giddings' red-and-green-line map, completely unbeknownst to them! And so, between all of the employees and the police officer, everybody must have thought that William was merely trying to create a controversy, where they thought there otherwise was none.**

**If only Officer Golden and the various city employees he interviewed had actually shared with each other the totally different maps that had been at play, before jumping to such unsubstantiated conclusions that William was maybe some sort of bumbling criminal idiot that was just trying to “get out of” a ticket.** It's truly shocking how Officer Golden and City Of Fort Collins Surveyor Jeff County were literally in the same room with each other at one point in time, and were so incredibly close to actually comparing with each other the two different maps in existence of Jefferson Street Park, such that they could have finally exposed to themselves the real controversy that William had originally uncovered – **that Sergeant Giddings had obtained the wrong park boundaries from the wrong city department.** But alas, they failed to show them to each other, thus prematurely ending what could have been the most useful of investigations otherwise.

**Of course, the correct boundaries of Jefferson Street Park were technically still within Officer Golden's reach, because if you look closely in his police report, toward the end of it, you'll notice that he mentioned how Doug Cain referenced the “FC Maps” platform, where he said he had referred William to when he went asking him for the park boundaries. And so, why didn't Officer Golden simply follow up on that important piece of information, and actually go view the referenced, correct boundary map of Jefferson Street Park for himself, as directly available on FC Maps (gisweb.fcgov.com)? I guess we'll never know...**

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**ON MAY 19, 2016, AT 3:19PM,** William followed up with [Fort Collins Director Of Parks Mike Calhoon](#), once again asking if there was a map – any map – of Jefferson Street Park, that his office could directly provide he and his brother with. After digging around in the Parks Department's servers, Mike Calhoon was indeed able to find and provide a map, **though it was the only map to which the department had on file** (see [Email Exchange With Mike Calhoon Regarding Maintenance Map](#)).

Later, William asked what the letters **F-A-T** meant at the top of the map, to which he was told by the department meant **“Facilities And Trails.”** As in, he had received a strictly service-and-maintenance-related, internal-use-only map of Jefferson Street Park, which otherwise included within its ambit the publicly owned and maintained 100-foot right-of-way of Linden Street (and more importantly, to which coincided almost exactly with the same green lines in the red-and-green-line map originally provided by them to Sergeant Giddings).

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**ON MAY 26, 2016,** William stood trial at the [Fort Collins Municipal Courthouse](#), located at 215 N Mason St, for his initial Occupy Jefferson Protest [city park curfew municipal violation](#) (see [The Fort Collins Police Lose Their Park Curfew Municipal Trial Against William](#)).

**At William's trial, Sergeant Giddings likewise submitted to the Court, just as he did in David's trial, the red-and-green-line, internal-use-only, maintenance-based, service-related “map” that he had obtained from the Fort Collins Parks Department.**

Just as determined in David's recent municipal court trial over the same general issue of standing in a sidewalk that's adjacent to a park, the map offered to Judge Kathleen Lane by Sergeant Giddings was irrelevant in her assessment of whether William was guilty of the charges or not. **In fact, Judge**

**Lane found William not guilty** of being in a closed city park after hours, as she had equally determined, just like she did in David's trial, that the sidewalk running alongside the street – Jefferson Street this time versus Linden Street – was still not clearly designated and posted as being part of a park. **This is a critically important finding too, because technically William had actually been fully inside of the official, lease-based boundaries of the Jefferson Street Park, as he walked down its sidewalk when he was ticketed by Sergeant Giddings. But as Judge Lane reiterated, “what the code requires, is that, it's an area that is designated and posted as a park.” (regardless of whatever maps the police may try to use to enforce park curfew violations with otherwise).**

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**ON JUNE 1, 2016, AT 8:30AM,** William stood trial at the [Larimer County Courthouse](#), located at 200 W Oak St, for a similar and related, state-based charge of [“Unlawful Conduct On Public Property”](#) (see [William Gets Wrongfully Convicted By The Larimer County DA For Standing In A Sidewalk](#)), but whose underlying charge still otherwise stemmed from, and was identical to, the same allegation as his brother of being within the alleged green-line-based park boundaries of Jefferson Street Park, but not the red lines, between the hours of 11pm and 5am when that area was purportedly closed.

**At William's second trial, the County Court miraculously did what the Fort Collins Municipal Court did not, and unlawfully accepted Sergeant Giddings' falsified, fabricated, and fully perjured hearsay testimony that the green lines contained within the red-and-green-line, internal-use-only, maintenance-based, service-related “map” of Jefferson Street Park to which he had initially obtained from the Parks Department was somehow the “official” boundary map of the park, in addition to the Parks Department also somehow being the “official source for park boundaries” within the City Of Fort Collins – despite the complete lack of any representatives whatsoever from the Parks Department actually being subpoenaed to trial in order to testify on behalf of such empty, baseless, and 100% fraudulent hearsay otherwise. The District Attorney also likewise**

[unlawfully tailored its elements and jury instructions](#) to remove the underlying question of law at hand (that Municipal Court Judge Kathleen Lane had already clarified was required as just mentioned above) of underlying park curfew municipal-ordinance-based elements of city parks needing to be properly “designated and posted” as closed for park curfew violation convictions to legally stand (in any court).

**Together, these gross deviations from both fact and law actually wrongfully convicted William of purportedly being in a designated and posted as closed city park that same night as his brother, when he had actually, legally, really, truly, officially, in fact, had not been.** Fortunately, William was at least able to take the opportunity to ask further clarifying questions of Sergeant Giddings to determine if he had been telling the truth to him, his brother, and the other Occupy Jefferson protesters (or not, as turned out to be the case).

(SIDE NOTE: WILLIAM STILL PROVIDED TO THE JURY [ALL THE EVIDENCE](#) HE AND HIS BROTHER HAD OBTAINED UP TO THAT POINT, INCLUDING THE VERY GIS DEPARTMENT MAP OF JEFFERSON STREET PARK RELIED UPON BY MUNICIPAL COURT JUDGE KATHLEEN LANE IN HER DECISION TO FIND DAVID NOT GUILTY OF THE SAME UNDERLYING CHARGE ON MARCH 17, 2016. HOWEVER THE JURY APPARENTLY JUST COULDN'T SEE PAST THE PROSECUTION'S OTHERWISE FAULTY ARGUMENTS, AND WRONGFULLY CONVICTED WILLIAM ANYWAYS DESPITE STILL BEING ABLE TO FAIRLY FIND HIM NOT GUILTY AS JUDGE LANE PROVED POSSIBLE IN DAVID'S TRIAL OVER THE SAME EXACT ISSUE).

Following are direct quotes taken from the County Court trial of the opening and closing statements, the relevant conversations that took place between the [Larimer County District Attorney Deputy Michael Deschenes](#) and [Sergeant Giddings](#), and the ones between [William](#) and [Sergeant Giddings](#), regarding the purported official boundaries of Jefferson Street Park, how they were obtained, and what relationship they had to the publicly owned and maintained right-of-way sidewalk of Linden Street that he and his brother had been lawfully standing on that morning of September 15, 2015:

**DESCHENES:** “Good morning again. Uhh, what we're gonna talk about today is a fairly simple case. And, uhh, what the evidence is gonna show you, we're gonna get Sergeant Giddings up here to talk to you and he's gonna tell you about, is how on September 13th, and September 14th, he told Mr. Montgomery, the defendant, that he could not stay overnight in the park, after hours closed, in Jefferson Street Park. **He provided, umm, evidence to Mr. Montgomery, as he will testify, uhh, about the boundaries of the park, and the hours of the park, and why Mr. Montgomery could not stay in the park overnight.** Uhh, on September 15th, Sergeant Giddings and several other officers returned to Jefferson Park, where, among other people, Mr. Montgomery was present. **They, uhh, cited him for Unlawful Conduct On Public Property, for being in the park, after he had been warned, two- both days prior that he could not be there between the hours of 11pm and 5am where the park was clearly posted as being closed.** Uhh, Mr. Montgomery contests these allegations and that is why we are here today. Umm, I encourage you to do exactly as the court instructs. Use your common sense in assessing the evidence. At the end of the, at the end of all the evidence, we'll do closing arguments you'll get to hear from me again, you'll get to hear from Mr. Montgomery directly again, and then I'll have one brief statement to you before we close out. Umm, at that point, we're gonna ask you to go back in the jury room, look at the elements of the crime and the evidence that we've entered in, and, uhh, return with a verdict of guilty. Thank you.”

**WILLIAM:** “Good morning ladies and gentleman. Umm, sorry for taking up your time, or sorry that these guys are taking up your time. Umm, there's a lot that went up to- leading up to this point, uhh, with Occupy Jefferson, and the park boundaries being, umm, talked about and so forth. **Umm, the quote-unquote evidence that I was, uhh, shown to by the officers conflicted directly with the evidence that I was gathering at the same time, through other sources, other, uhh, city officials.** And, umm, it pretty much comes down to, I called their bluff. **Umm, I was in a sidewalk, and the next night I was also in a sidewalk. I was never in the park.** They never warned me- [...] Umm, basically, the evidence that will be presented to you, hopefully you'll be able to see that, umm,

*they really didn't know where the park boundaries were, they tried to define them live, and, umm, we were in violation of simply not taking their orders, regardless of an actual violation of law, that we had done our research on, and have come to the conclusion of, that, uhh, we were not in violation of law. I have all the evidence that I can possibly present. I guess they're choosing to let their evidence be presented, umm, but I don't want this to look like it's some sort of zoning meeting where you guys are determining what a surveyor is. Uhh, I'd like you to refer to the evidence as people, versus, uhh, some, you know, I don't now what they're gonna pull, let's just put it that way. So, thank you."*

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**DESCHENES:** "Okay, umm, so why were you there at 2am?"

**GIDDINGS:** "Uhh, we responded at 2am, umm, mainly because that's when the park is closed. Umm, so, to give some background, we had, uhh, had really given a progressive enforcement approach to the group, uhh, when we first started interacting with them. Uhh, so we chose to, we would initially respond to the park just as it was closing, or just before the park would close at 11pm. Uhh, we would educate the group that was present in the park on, on, the park rules, umm, which were the hours the park was closed, and that no camping was allowed anywhere inside the park or on any other public property. Umm, we would warn those individuals, uhh, if we contacted people there that were violating either one of those, umm, municipal codes. We would, uhh, provide them a warning for their first offense. If we responded either later that evening, or on a, on a subsequent day, we would then cite that individual, if they've already been educated and warned, we would cite that individual into municipal court with a municipal violation for either one of those codes. **Uhh, if we returned the subsequent day after that and that same individual was still present in the park they would then be cited into county court for the Unlawful Conduct On Public Property charge."**

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**DESCHENES:** "And, uhh, just to be very specific, did you inform Mr. Montgomery, uhh, the hours that the park was open?"

**GIDDINGS:** "Yes I did."

**DESCHENES:** "Umm, how did you, how did you inform Mr. Montgomery the hours of the park?"

**GIDDINGS:** "Umm, I, I had, uhh, addressed him, and, uhh, three other members of the group who were present at the time. I informed them that it was now 11pm, that the park was closed. Uhh, that they, uhh, that they could gather their belongings and leave, and they could return to the park at 5am when the park opened. **Umm, I also, uhh, explained to them the park boundaries, I was very detailed in explaining where the park boundaries were. Explaining to them that the boundaries extended curb-line to curb-line, so the curb-line on Linden Street to the curb-line on Jefferson Street. And that, that area, was all included within the boundaries of Jefferson Park, and that they now needed to leave since the park was closed, and asked them to leave."**

**DESCHENES:** "And are you aware of any, umm, any posted signs informing the public of the park's hours?"

**GIDDINGS:** "Yes, there is at least one posted sign in Jefferson Park that, that posts the hours that it is closed."

**DESCHENES:** "And, umm, did you point this out to Mr. Montgomery at any point?"

**GIDDINGS:** "**Uhh, in some of the, uhh, not that evening I didn't specifically address that sign, but, uhh, on some other interaction there I don't remember the exact dates and times we spoke about where, where the signs were present at the park."**

**DESCHENES:** “And did you point out to Mr. Montgomery where the boundaries of the park were?”

**GIDDINGS:** “Yes I did.”

**DESCHENES:** “Uhh, how did you point those out?”

**GIDDINGS:** “Uhh, I was standing, uhh, with the group at that southeast corner, so near the corner of Linden and Jefferson Street, and I literally pointed to the curb-line on Jefferson Street, and said the boundary extends all the way to this curb, and then pointed to the curb-line on Linden Street, and explained that that boundary line extended to the curb-line on Linden Street.”

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**DESCHENES:** “Moving along. Did you have an occasion to encounter Mr. Montgomery on September 14th, 2015?”

**GIDDINGS:** “Yes I did.”

**DESCHENES:** “About what time was that?”

**GIDDINGS:** “Uhh, at- that was approximately 2:25 in the morning.”

**DESCHENES:** “And what was the nature of your encounter with Mr. Montgomery on the 14th?”

**GIDDINGS:** “Umm, this encounter, again, was, so- we were returning approximately three and a half hours after I had addressed the group and informed them that the park was now closed and asked them to leave. Uhh, we then returned at 2:25 in the morning, umm, to contact the group, umm, for the violations that were committed.”

**DESCHENES:** “And, uhh, did you explain to Mr. Montgomery why you were there?”

**GIDDINGS:** “Yes I did.”

**DESCHENES:** “And, did you explain the hours of the park to Mr. Montgomery?”

**GIDDINGS:** “Yes I did.”

**DESCHENES:** “Uhh, what hours did you tell him the park was-?”

**GIDDINGS:** “Umm, I again informed him that the park was now closed, the park remains closed from 11pm to 5am. I again had further discussion with him about the boundaries of the park, and actually, uhh, spent an extended period of time, approximately 45 minutes, umm, speaking with Mr. Montgomery at the park, to, umm, uhh, basically discussing the reasons why we’re enforcing those, those laws and educating him on, on, on the laws.”

**DESCHENES:** “And, uhh, did you again, what again did you tell him the boundaries of the park were?”

**GIDDINGS:** “I again explained to him that the boundaries of the park extend curb-line to curb-line. They run from the curb-line on Jefferson Street to the curb-line on Linden Street.”

**DESCHENES:** “And, uhh, how did you indicate these boundaries to Mr. Montgomery?”

**GIDDINGS:** “Uhh, I again pointed ou- pointed to the curb-lines, umm, along the street-line, and explained that to him. I did have a map, uhh, present with me at the time that I showed another individual. I offered to show it to members of the group, umm, just one member of the group, not Mr.



Montgomery, stepped up to view the map on my phone so they could see the image of the actual map. *But I did, umm, thoroughly explain those boundaries to Mr. Montgomery.*

**DESCHENES:** “Okay, and, umm, was Mr. Montgomery receptive to your explanations in this 45 minute discussion?”

**GIDDINGS:** “Uhh, no he was not receptive. Very argumentative, and, umm, stated a number of reasons why he felt that he didn’t need to, uhh, abide by those rules or regulations.”

**DESCHENES:** “Okay, umm, to be clear Sergeant Giddings was Mr. Montgomery camping in the park on September 13th?”

**GIDDINGS:** “*He was not camping, he was just, uhh, present in the camp that had been established at the park.*”

**DESCHENES:** “And, uhh, getting back to the 15th of September, uhh, were people camping on the sidewalk of Jefferson Park?”

**GIDDINGS:** “Yes.”

**DESCHENES:** “And, when did you first observe Mr. Montgomery?”

**GIDDINGS:** “*Uhh, at- when we arrived on scene, just as I was pulling up I observed Mr. Montgom- uhh, Mr. Montgomery standing with, umm, standing nearby several other seated members of the Occupy Jefferson Park group, uhh, along the Linden Sidewalk. There's some park benches that had been put in along the sidewalk, and he was, uhh, standing with that group who were sitting on the benches.*”

**DESCHENES:** “And, umm, what happened with Mr. Montgomery, after you arrived?”

**GIDDINGS:** “*Umm, after we arrived, as we pulled in Mr. Montgomery observed all of the patrol cars arriving at the scene. He, he, umm, then started walking northbound along the Linden Sidewalk, umm, away from the, the park bench area where he initially was standing, and went to his bicycle, which was, uhh, located near the northeast corner of the park.*”

**DESCHENES:** “And, umm, did you, at any point this even- in that- on the evening of September 15th, say anything to Mr. Montgomery?”

**GIDDINGS:** “I did.”

**DESCHENES:** “What did you say?”

**GIDDINGS:** “Uhh, when I initially approached him, I asked him, I was somewhat disappointed to see that he had returned to the park. I honestly felt after our extended conversation that we had the night before, after spending 45 minutes with him, explaining him, umm, the- all the rules and regulations, letting him vent a little bit some of his anger towards, uhh, the local government. I felt that we ended that conversation well, and I thought that he was, was going to heed the warnings that he had been provided, uhh, so when I approached him on the 15th, the first I said to him was, William, why are you here, we talked about this last night, you know, you're not supposed to be here between 11 and 5pm.”

**DESCHENES:** “And, what was Mr. Montgomery's reaction?”

**GIDDINGS:** “Uhh, he initially didn't say anything, he was just filming me with his cell phone, standing there filming me with his, his cell phone.”

**DESCHENES:** “And what did you do next?”

**GIDDINGS:** *“Umm, I then informed him he was going to be receiving a, uhh, uhh, a summons to court for Unlawful Conduct On Public Property.”*

**DESCHENES:** *“How did Mr. Montgomery react to that?”*

**GIDDINGS:** *“He, uhh, at that point he started to argue with me, umm, the boundaries of the park.”*

**DESCHENES:** *“Umm, and, what did you say the boundaries of the park were?”*

**GIDDINGS:** *“I, again explained to him that the boundaries of the park extend curb-line to curb-line, umm, Jefferson Street to Linden Street. At that point he requested, umm, to see, I, I, uhh, I, I can't remember at what point that map came up, but he requested to see a map of the boundaries of the park. And I then showed him the same map that I had shown other members, and the map that I had referenced to explain to them the boundaries of the park. I pulled that image up on my cell phone, and showed him the boundaries of the park.”*

**DESCHENES:** *“Sergeant Giddings, I've handed you what's been marked, solely for identification purposes, is People's exhibit 14. Uhh, could you tell us what that is?”*

**GIDDINGS:** *“Yes it is. This is a satellite image, umm, from above, of Jefferson Park, and, uhh, has, umm, **clear markings on it that indicate the boundaries of the park.**”*

**DESCHENES:** *“And, is this the map that you showed Mr. Montgomery on the evening, or the, sorry, the early morning hours of September 15th?”*

**GIDDINGS:** *“Yes it is.”*

**DESCHENES:** *“Umm, Your Honor, with permission of the court, I'd like to blow the map up so Sergeant Giddings can walk us through what he explained to Mr. Montgomery.”*

**JUDGE ECTON:** *“That's fine.”*

**DESCHENES:** *“Alright, Sergeant Giddings. If you could, umm, indicate on the map, what you told Mr. Montgomery.”*

**GIDDINGS:** *“Yes I can. Umm, I, on the map it may be a little difficult to see, but there, you'll see two different colored lines on the map. **And as I explained to Mr. Montgomery that night, umm, the green line on the map indicates the boundaries, the park boundaries for Jefferson Street Park. Umm, the red line indicates the original railroad property line.** And to give you some background on the park, umm, it- at the time, and for many years prior, the land was actually owned by the railroad, but leased back to the city, umm, so that the city could operate it as Jefferson Street Park. Umm, the- it has since sold and is no longer owned by the railroad. **But, the red line indicates the original railroad property, that's why you see it extend over the railroad tracks. But the green line is the, umm, official boundary of Jefferson Street Park.**”*

**DESCHENES:** *“And, umm, did Mr. Montgomery have any questions about, the boundar- the green boundary line?”*

**GIDDINGS:** *“Uhh, I don't recall any specific questions after I explained it to him, other then he, he, he, uhh, he started to maneuver and move himself to different locations from where we were standing, asking am I now standing in the park, am I now standing in the park. Umm, and I was, just explained to him, you kn- again, where the boundaries were, **and explained that all he had to do to exit the park was to***

*continue to the left, umm, on Linden Street, and cross the railroad tracks, and he was no longer inside Jefferson Street Park.”*

(SIDE NOTE: HERE, SERGEANT GIDDINGS IS REFERRING TO [TIMESTAMPS 15:32 MINUTES TO 16:19 MINUTES](#) OF HIS POV CAMERA FOOTAGE, WHICH IF YOU VIEW FOR YOURSELF, YOU CAN CLEARLY SEE THAT WILLIAM STILL REMAINED OUTSIDE OF THE OFFICIAL AND DESIGNATED / POSTED BOUNDARIES OF JEFFERSON STREET PARK, DESPITE HIM MOMENTARILY STEPPING OFF THE CONCRETE SIDEWALK AND INTO THE DIRT LOCATED NEXT TO IT. SO NO MATTER WHAT, WILLIAM WAS NEVER IN VIOLATION OF ANY MUNICIPAL OR COUNTY CODE ORDINANCES THAT NIGHT REGARDING PARK CURFEWS, REGARDLESS OF THE CIRCUMSTANCES.)

**DESCHENES:** *“And, uhh, the, uhh, campsite, that you were at, uhh, on September 15th, was that within the green line boundaries?”*

**GIDDINGS:** *“Yes it was.”*

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**WILLIAM:** *“So, uhh, Sergeant Giddings, umm, before the Occupy Jefferson Protest that, uhh, started sometime early Novemb- or- September, umm, did you ever, umm, uhh, discuss the park boundaries with anybody, uhh, in your, in your team, in your police department, with Jefferson Park? Were you aware of any boundary issues with Jefferson Park, before Occupy Jefferson?”*

**GIDDINGS:** *“Uhh, I had no circumstances where the exact boundaries of the park came in play prior to that, that, umm, that week.”*

**WILLIAM:** *“Okay, so, umm, I believe you said that, uhh, you told us that the park boundaries go to the curb on both sides, to include both sidewalks?”*

**GIDDINGS:** *“Yes, that is correct.”*

**WILLIAM:** *“So, umm, would you be willing to admit that they appear to look like sidewalks, versus, uhh, park material, park land?”*

**GIDDINGS:** *“I mean, it's not grass, if that's what you're asking. They are sidewalks.”*

**WILLIAM:** *“Okay. So you identify them using the word, sidewalk?”*

**GIDDINGS:** *“I would consider that, yes.”*

**WILLIAM:** *“Umm, so, umm, sidewalks in the city, uhh, I assume if you are, uhh, uhh, you know, an officer of the law, you're trained in the governing law, umm, what sort of, umm, closures can sidewalks have, if you are aware?”*

**GIDDINGS:** *“Well, if the sidewalks are within park boundaries, then tho- those areas are closed from 11pm to 5am. Many of our city parks contain sidewalks.”*

**WILLIAM:** *“Not speaking of sidewalks that are adjacent to or included in parks. Just a simple sidewalk on the side of a road. If you see that it's, umm, got some fencing around it, uhh.” [...]*

**GIDDINGS:** *“Umm, a park, uhh, sidewalk areas located outside of parks but on public right-of-ways, umm, don't suffer any closures.”*

**WILLIAM:** *“Okay.”*

**GIDDINGS:** “So as long as it's not on private property, there are some sidewalks that are also located on private property that, I guess those conditions would be subject to the property owners.”

**WILLIAM:** “Okay. So, umm, there aren't any closures, umm, uhh, would there, in your experience, would there potentially be a closure for, uhh, like construction nearby, like a, you know, to put up a fence there to allow, so, that they have room to work?”

**GIDDINGS:** “**Yep- yes, they might put up fencing or signing of some, umm, some part, just to get people to use a different sidewalk. I imagine that.**”

**WILLIAM:** “**Umm... so, uhh, the particular sidewalk on, adjacent to Linden Street, if you're looking at some similar map as I am... say you're going westward from the river, and, uhh, you're just about to cross over the, uhh, railroad tracks... is there any indication on the sidewalk, that that sidewalk is closed, as you're walking into the park, from the side corner, along the sidewalk?**”

**GIDDINGS:** “**There's no indication, at the railroad tracks.**”

**WILLIAM:** “Also, too, if you were to be coming, uhh, walking south from Rodizio Grill, on the, what looks to be a sidewalk adjacent to Jefferson Park... uhh, if you're to be entering that sidewalk from Rodizio Grill, would there be any indications that that sidewalk would be closed?”

**GIDDINGS:** “Uhh, the first indication is located approximately one third of the way into the park, umm, on a light-pole, on the right side of the sidewalk along the curb line, there's a sign that indicates, umm, that it is Jefferson Park, that alcoholic beverages are prohibited, and that the park is closed from 11pm to 5am.”

**WILLIAM:** “Okay. But that sign, do you recall if that sign says that the, uhh, sidewalk is also closed?”

**GIDDINGS:** “**It does not reference the sidewalk.**”

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**WILLIAM:** “So when you had, uhh, checked with the city to determine park boundaries, who did you check with?”

**GIDDINGS:** “**Uhh, I spoke with Ranger Bud Bredehoff, with the Parks Department.**”

**WILLIAM:** “Did you, uhh, confirm any of these checkings, umm, with the city attorney?”

**GIDDINGS:** “**I had no need to confirm it with the city attorney.**”

**WILLIAM:** “Okay, so is there any, umm, conversations that you ever had with the city attorney, whatsoever, on this topic?”

**GIDDINGS:** “**During that week, no.**”

**DESCHENES:** “**Your honor, umm, this line of questioning seems to be soliciting hearsay.**”

(WHAT IS THIS?!?!? PROOF THAT THE DISTRICT ATTORNEY KNOWS WHAT HEARSAY IS?!?!? AND YET CONTINUES TO HYPOCRITICALLY ALLOW EQUALLY PURE HEARSAY TO BE SPEWED BY SERGEANT GIDDINGS REGARDING THE BOUNDARIES OF THE PARK...)

**JUDGE ECTON:** “I'll allow that answer, and, Mr. Montgomery, go ahead and ask your next question, we'll see if it merits an objection.”

**WILLIAM:** “Umm, so did you mention anything to us, about, a city attorney being involved?”

**GIDDINGS:** **“I don't recall. I had no conversations with the city attorney during the week that I was, present with you guys, at, at the park.”**

**WILLIAM:** “Uhh, did you check any other sources, umm, uhh, to confirm against, uhh, when you got that map from the Parks Department?”

**GIDDINGS:** **“Again, no. I had no need to speak with anyone else other than the Parks Department. They have the ultimate authority and, and official maps of the park boundary.”**

(NOTHING BUT A 100% FALSIFIED, FABRICATED, AND FULLY PERJURED HEARSAY STATEMENT CONJURED UP SOLELY BY SERGEANT GIDDINGS IN A FAILED ATTEMPT TO COVER UP HIS OWN WRONGDOINGS. THE PARKS DEPARTMENT DOESN'T HAVE THE ULTIMATE AUTHORITY, NOR DO THEY HAVE THE OFFICIAL MAPS OF PARK BOUNDARIES, NOR DID THEY EVER ONCE ATTEST TO SUCH THINGS!)

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**WILLIAM:** “Uhh, so generally speaking, when you're looking for, umm, jurisdiction, umm, what's the first place that you refer to? Uhh, for, say to determine what's private property or public property... someone gives you a call... uhh, what tools, if any, do you use at your disposal to determine jurisdiction?”

**GIDDINGS:** “Well, umm, if we have to sometimes we use the mapping program that's, umm, in our computer... uhh, oftentimes it's, uhh, it's very clear to us, umm, you'd have to give me more of a specific example... but I can't think of any other time that I've had an issue trying to determine, umm, exact boundary lines of where public property turned into private property. The main reason in this circumstance that I went to obtain the map from the Parks Department is because I was informed by members of the group on September 9th when I first interacted with them, that they, umm, had been told that they could be in the grassy area to the south of the sidewalk along Jefferson Street, that they were informed by another, umm, official, that that was outside the park boundaries. **Umm, I didn't believe that to be correct, but I didn't, umm, know 100%... well that's why I contacted the Parks Department and obtained an official map with those boundaries.** Umm, that's the sole reason why, umm, I went out, and sought that map.”

**WILLIAM:** “Uhh, sure, thank you, umm. So who is, uhh, Bud?”

**GIDDINGS:** “Bud Bredehoff, he's a ranger, he's one of our two park rangers that works for the city, uhh, Parks Department.”

**WILLIAM:** “Okay. And, umm, uhh, are you aware of mapping applications that are offered by the city, umm, services to the public?”

**GIDDINGS:** **“I, I know there's a, a GIS Department, I've never used that before. Umm, I do know that if you google or search on the city website, they, uhh, under the Parks Department, they have some general maps available to show people where the natural areas or the city parks are located at. Umm, just some general location maps. That's all I'm really aware of.”**

**WILLIAM:** “Okay, so, that you are aware there are some maps available online?”

**GIDDINGS:** “Yes.”

**WILLIAM:** “Okay. Offered by the city, via their website?”

**GIDDINGS:** “Yes.”

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**WILLIAM:** “So, uhh, sorry, could you, uhh, summarize that, uhh, one more time for me, I apologize.”

**GIDDINGS:** “Again, you were asking what that land was, umm, starting from the edge of the railroad tracks, working north along Linden Street, umm, right at the railroad tracks is where the boundary line for the park ends, umm, the railroad tracks themselves would be private railroad property, but, umm, allows by law for people to pass over them only at marked crossings. Umm, and then on the other side of the railroad tracks is a short section of sidewalk, umm, public sidewalk before a driveway entrance into a private parking lot.”

**WILLIAM:** “Okay, so you do consider that little strip there, east of the railroad tracks to be, right of way?”

**GIDDINGS:** **“I would consider it to be public sidewalk.”**

**WILLIAM:** “Public sidewalk, okay. Umm, but, I assume public sidewalk is the same definition is, of right of way, when talking about plats, and, you know, stree- sidewalks that are adjacent to streets?”

**GIDDINGS:** “I wouldn't know, I couldn't testify to the legal definition, I would just consider it a public sidewalk.”

**WILLIAM:** “Okay, one that does not close?”

**GIDDINGS:** **“Umm, unless it's posted for some reason, one that I would assume is not closed.”**

(WELL WHAT DO YOU KNOW, SERGEANT GIDDINGS HIMSELF EVEN ADMITTED THAT SIDEWALKS NEED TO BE DESIGNATED AND POSTED AS CLOSED FOR THEM TO ACTUALLY BE CLOSED.)

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**WILLIAM:** “Umm, is there any, umm, way to tell, uhh, what's the green and what's the red... uhh, just looking at the map all by itself?”

**GIDDINGS:** **“No. There is nothing on the map itself that explains the delineation of the two colors.”**

**WILLIAM:** “So there's no, there's no legend, okay.”

(AND FINALLY, HERE COMES THE OFFICIAL, 100% UNSUBSTANTIATED, FALSIFIED, FABRICATED, AND FULLY PERJURED HEARSAY TO WHICH THE CITY AND COUNTY'S ENTIRE WRONGFUL AND MALICIOUS PROSECUTION RESTED ON...)

**GIDDINGS:** **“That was just from my, from my own, uhh, investigation, and speaking with the Parks Department.”**

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**WILLIAM:** “So you are aware that there are streets, and then there's designated sidewalks that are adjacent to streets, that otherwise don't close unless posted.”

**GIDDINGS:** “Yes, I know there are streets, and some- many streets are lined with sidewalks, most of the streets in the city of Fort Collins have sidewalks, alongside- alongside of them. Only some in more of the rural areas don't have sidewalks.”

**WILLIAM:** “So uhh, when you had warned us, about being in the park, umm, you had mentioned that it went curb to curb, umm, on the 14th, was there a discussion over if the sidewalks were included or not, with that park boundary?”

**GIDDINGS:** “Yes, I was very specific, because curb-line to curb-line includes the sidewalks. The sidewalks are within the curb-lines on both sides of the park, and I was very specific on both occasions.”

**WILLIAM:** “Now, did you say anything to me, to the effect of, if I'm walking down Linden Street, umm, that if I needed to make sure I didn't break the rule of being in a park, that I needed to cross the street and then walk down the other side of the street in order to not violate?”

**GIDDINGS:** **“I remember you specifically asking about, well right of way, how do I get to the other side of the street, and I pointed at the sidewalk across the street and said you could utilize that sidewalk to cross Jefferson Street if you wanted to.”**

(HOW ABSURD AND VIOLATIVE OF EQUAL PROTECTION AND DUE PROCESS A REQUEST LIKE THAT WOULD BE!)

**WILLIAM:** “Okay, so, umm, if you're not there to inform somebody that this particular sidewalk adjacent to Linden Street is, in fact, in the park, umm, what indication does somebody have that, uhh, they're in a park when they're walking, uhh, down the street, through either sidewalk, umm, Linden or Jefferson?”

**GIDDINGS:** “Uhh, there are se- a number of signs located along the sidewalk. Uhh, there are, uhh, three signs- two on the, on the Jefferson side of the sidewalk, as you're walking from Rodizio Grill, umm, uhh, towards Linden Street. There are two signs on the light pole at the edge of the, uhh, the curb line facing towards the sidewalk. There's the main Jefferson Street Park sign that's located, umm, uhh, in the, near the center of the park, in the grass, faced out towards the sidewalk, and then there is one more additional sign located right at the corner of Linden Street and Jefferson Street, facing the sidewalk on Linden Street that addresses it as Jefferson Park and specifically states that alcoholic beverages are prohibited inside the park.”

**WILLIAM:** **“Okay, so none of these signs, umm, are specific enough to tell you that the very sidewalk itself is also closed?”**

**GIDDINGS:** **“No, again, none of those signs specifically address the sidewalk. They all pointed towards the sidewalk and are visible from the sidewalk.”**

**WILLIAM:** **“Okay, so, umm, so it is possible that somebody could be walking down either sidewalk, see the, uhh, sign for the, umm, park, and then, uhh, mistakenly not associate it with the sidewalk, just associate the sidewalk with the street?”**

**GIDDINGS:** **“It's possible.”**

**WILLIAM:** “Uhh, what was the original violation that, uhh, I, uhh, had allegedly committed, umm, the day prior to this event?”

**GIDDINGS:** “That was within- that was being within the park boundaries when the park was closed. You were contacted at 2:25 in the morning, inside the park boundaries.”

**WILLIAM:** “Okay, and the park, umm, in order to be in violation of the park, the statute itself, does it say something that the park boundaries need to be, uhh, designated and posted signage, to, warn somebody that, that it's, that they're in a park?”

**GIDDINGS:** “I don't know the exact wording of the statute, so I wouldn't want to, I'd have to read it to confirm that, but it do- it does say that it does have to be designated, umm, natural area or a park.”

(SO, UMM, EXACTLY WHY IS WILLIAM STILL BEING PROSECUTED THEN?!?!? TRULY SCARY HOW SERGEANT GIDDINGS COULD ACTUALLY RECALL, BUT TOTALLY DISREGARD, WHAT MUNICIPAL COURT JUDGE KATHLEEN LANE HAD JUST TOLD HIM IN DAVID'S TRIAL ON MARCH 17, 2016 – THAT PEOPLE FOUND IN THIS PARTICULAR SIDEWALK COULD NOT BE CONSIDERED IN VIOLATION BECAUSE OF HOW IT IS NOT DESIGNATED AND POSTED AS PART OF A PARK.)

**WILLIAM:** “Gotcha, so designated, that's a very good word.”

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**WILLIAM:** “Okay, so, umm, in H-3 and H-1, umm, it shows kinda the entrance and exit points, uhh, roughly of the sidewalk that's running along Linden Street, umm, from those pictures does it appear that the sidewalks themselves are marked, in any way, uhh, for closure, either temporarily or otherwise?”

**GIDDINGS:** “Umm, the only sign that you see present is in H-2 and H-4, you can see the one sign I referred to earlier, umm, that's facing out towards the sidewalk that identifies it as Jefferson Park, and specifically states alcoholic beverages are prohibited in the park. In H-1 and H-3 there are no signs visible in either of these photographs.”

**WILLIAM:** “Okay, but the one that does have the picture of the sign in it, umm, that sign is inside the grassy area that's just north and east of both sidewalks, Linden and Jefferson?”

**GIDDINGS:** “Yes, it looks, uhh, it's posted just inside that decorative railing, facing out towards the sidewalk.”

**WILLIAM:** “Okay, so it's facing out. One could imagine it's indicating inwards. Umm does that sign say anything about, umm, sidewalk closures, does it say anything at all?”

**GIDDINGS:** “Again, no, none of the signs specifically say, address sidewalk closure.”

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Then, William took the stand and submitted his own witness testimony as to what had happened. (But, so as to not repeat here what has already been reported, it can safely be said that everything William testified to on the stand were all the same factual circumstances leading up to this point in the case, as has already been explicitly laid out in this particular report.)

Next, during the jury instruction submittal phase of the trial, William and Judge Ecton argued in circles for over ten minutes because of how William insisted on presenting to the jury the underlying municipal code elements of “being in a designated park after hours” (so as to fairly inform them of the underlying “rule or order” that Sergeant Giddings had accused him of violating) while Judge Ecton insisted that such

underlying municipal code elements were not relevant to the case, or as he literally put it, **“you're not facing a violation of that law, you're facing a**



**violation of this law.”** (ANYBODY WHO MAY BE INTERESTED IN DIGESTING THE FULL CONVERSATION SURROUNDING SUCH AN ABSOLUTELY AND PROFOUNDLY IRRATIONAL, ILLOGICAL, ERRONEOUS, AND DOWNRIGHT ABSURD CONCLUSION THAT JUDGE ECTON CAME TO, CAN LISTEN TO THE FULL TRIAL AUDIO FROM [TIMESTAMPS 4:07:58 MINUTES TO 4:19:12 MINUTES.](#)) Suffice it to say, William was unsuccessful in reasoning with the Court that the jury needed to be adequately informed of precisely what the underlying charge at issue entailed, and the need for him to be within a “designated and posted” as closed area otherwise. **(And thus, one can only imagine how badly this discrepancy, in conjunction with the DA also maliciously tailoring the “Unlawful Conduct On Property” elements themselves to not reference “prominently posted” language either, contributed to the jury’s wrongful finding of guilt in this matter – when compared to case law just established of the exact contrary by Judge Kathleen Lane during David’s municipal-court-based trial held on March 17, 2016 over the exact same issue.)**

Finally, the Larimer County District Attorney and William hashed out their final positions in the closing argument portion of the trial:

**DESCHENES:** “Thank you ladies and gentleman. We’re almost done, and, uhh, hopefully, you will have heard enough about sidewalks for the rest of your week, at least. Umm, it’s your job now to go back and look at the evidence that we saw today. And we saw a, a fair amount of it, uhh, for, what is essentially a very simple case. If we’re looking at that last instruction that we talked about, instruction number ten, the elements of the crime, uhh, it really distills down what we’re looking for in this case. First of all, the defendant, William Montgomery, is no, uhh, we know who he is, he’s been identified by Sergeant Giddings. And we know that it took place in the State of Colorado on September 15th, at

around 2am. **Uhh, we know this took place in Jefferson**

**Park,** (UHH, NO, IT DID NOT!), umm, and that William Montgomery was there, Sergeant Giddings was there. We know that Sergeant Giddings had issued a warning on multiple occasions leading up to

this, to Mr. Montgomery, that the park closed from 11pm until 5am. **That the park**

**boundaries extended from curb to curb.** (NO, THEY DO NOT!)

They had extended discussions about this. 45 minutes on the 14th, Sergeant Giddings stood there, in the park with Mr. Montgomery, explaining to him, why the park was closed, when it was closed, and what constituted the park. And the next day, on the 15th, Mr. Montgomery returned, ignored those explanations, and was cited, and that’s why we’re here today. Umm, so we have the rule, which was the park’s curfew, we have- it was issued by, the rule was explained clearly, and two times prior, to this, uhh, ticket, by Sergeant Giddings to Mr. Montgomery. We’ve- that’s four through six on the elements there. In the evidence you have, umm, Sergeant Giddings point of view camera from the night in question. It’s about a half hour long, and if you want to watch it, it’s in evidence, you’ve got the opportunity to go through it. Umm, I would encourage you to take the time to watch it. Mr. Montgomery, in his, uhh, testimony, alleged that he felt abused by Fort Collins Police, he felt marginalized by the police, he felt, quite frankly, targeted and attacked by the police in this ticket. Umm, if you watch that video, I encourage you to do so with an open mind and see how respectfully Sergeant Giddings treats Mr. Montgomery and everybody else that’s encountered in that video. Their property is respected, uhh, that they have accumulated in the park. It’s, uhh, even people who are arrested, their property is gathered up, and they’re then told that it will be saved for them, and that they can come back and pick it up. It’s not thrown out. You also see the condition of the park, and what was going on in terms of who was camping out in the sidewalk, what the sidewalk looked like, and how congruent it is to Jefferson Park. Umm, and you’ll be able to hear the discussion between Mr. Montgomery and, uhh, Sergeant Giddings, in relation to, uhh, the ticket that was eventually issued. We spoke a little bit in voir dire about, if a law enforcement officer gave you a warning not to park in a fire lane, even though the fire hydrant had been removed, would you still park there, and, uhh, the situation here is, is analogous. **Mr. Montgomery was told, the park extends from curb to curb, if you come back, again, you will be cited, for violating the park curfew.** And in Mr. Montgomery’s own testimony, he said, he understood that that was the position of law enforcement if he returned he would be cited. He knowingly violated the law. **And he had the**

**opportunity to call witnesses to say the sidewalk is not part of the park,** (YOU HAD THE OPPORTUNITY TO SUBSTANTIATE THE CONVERSE, BUT YOU DIDN'T EITHER!) **umm, the Court would issue subpoenas on his behalf and compel those people to be here, and he did not.** (AND NEITHER DID YOU! WHERE'S BUD BREDEHOFT, GUYS?!?!? AND BESIDES, THE BURDEN OF PROOF ISN'T ON ME, IT'S ON YOU! WHY SHOULD I HAVE TO PROVE MY INNOCENCE WHEN YOU SHOULD HAVE TO PROVE MY GUILT!) **Sergeant Giddings, however, obtained a map from the parks department, the agency responsible for maintaining and enforcing the rules of the park.**

(NO, IT'S NOT!) **Umm, he made sure it was an official map** (UMM, NO, HE ABSOLUTELY, UNEQUIVOCALLY DID NOT!), **that this is what the parks department relied on,** and he shared this information, both, in describing the boundaries of the park, he showed it to one of, uhh, Mr. Montgomery's, uhh, friends in the park, and he showed it to Mr. Montgomery the night that he wrote the citation. What we're asking you to do is to apply the law. And we're asking you to draw the line here, where people can not just choose which laws they obey based on which facts they're willing to research. **There's nothing in the record, there's nothing in the evidence that shows that Sergeant Giddings was mistaken, in his assessment of the park boundaries.** (EXCEPT THAT HE WAS MISTAKEN, AND INSTEAD SUBMITTED 100% PERJURED, 100% VERIFIABLY INCORRECT HEARSAY ON THE SUBJECT!) He did absolutely everything you want a law enforcement officer to do in enforcing the law. He looked exactly at the facts that are relevant to the case. **He went to exactly the agencies that manage the park and have the best position to know where the boundaries were** (NOPE, WRONG AGAIN! THE GIS DEPARTMENT IS WHERE HE SHOULD HAVE GONE!), and he communicated that information before issuing a citation to anybody. He wasn't issuing a citation for somebody for just wandering around, and you heard him say, in his 17 years as a police officer with Fort Collins, he had only issued a parks ticket for Unlawful Conduct On Public Property one time before. This is the, this the level of law enforcement that we want in our community, ladies and gentlemen, and I would encourage you to, uhh, deliberate, and come back with a verdict of guilty. Thank you."

**WILLIAM:** "Good afternoon guys, thanks for coming back. Boy, I don't even know where to start. I, umm, I've never been so disappointed in my life, of our own city, but hey, emotions aside, umm, we need to get to some facts here. Umm, this is a, a law that I have to actually be in violation of. Uhh, one of the biggest things that I think they are trying to push, is this some sort of defamation that I, umm, am just disobeying an order, and that that's my law that I violated, I disobeyed an order. Umm, I actually have to be in violation of an actual order in order for that to happen. Umm, the warnings heeded up to this point, uhh, were not the type of warnings that are actually constituting me being in violation of anything. Umm, uhh, okay so, uhh, coming down to the actual elements of the case, of course, that the defendant, in the State of Colorado, uhh, at the place and date and time charged, I was there, umm, on the sidewalk, uhh, entered or remained on any public property, or conducted himself on any public property. **This is where they just try to inject and assume that the park boundaries were already established. You already know about them William, we already told you about them. Telling me about the park boundaries is not establishing the actual park boundaries.** And, umm, when you go to the next section, in violation of an order, rule, or regulation, like I said, I actually have to be in violation of an actual rule or order. It was very apparent that Giddings, umm, knew about the park curfew statute, umm, but he, uhh, admitted that there's nothing mentioned whatsoever about sidewalks. And so when he gave me a rule or order regarding sidewalks, that, that isn't anywhere in the actual statutes. **Essentially, what this city is having to do, by not letting themselves do a better investigation, and not charge me, is having you guys decide what a municipal court does, which is basically, your own experience of umm, in this case, case law, umm, which is if a sidewalk is not clearly notated, what are you gonna do, you know, that the whole reason why this- we're even in court is because, it doesn't come down to, we simply told you. It's selective enforcement of the law if that's all that has to be happening.** It's just somebody telling you that a law has been broken. The whole point was,

these sidewalks, they're not closed, there- nobody before the park, or after the park, sees that they're closed, during the park it didn't look like they were closed, after talking to other people in the city, they all indicated that sidewalks don't seem to close. [...] Uhh, he had no idea what the boundaries were before Occupy Jefferson. Understandable, to an extent, but what really disturbs me is that, he says, and you guys say that, you know, **he came back with the rules of the park, and they were all well established,**

**umm, that's just hearsay. They don't even have anything but a, uhh, a circumstantial, maybe even service-oriented related map from the parks department.** Not even from the head of the department. And, umm, personally I am shocked that you guys didn't go to city attorney, or the GIS, or the, umm, survey department, because they would have all showed the same thing. **It's a 100 foot right of way, it's a, it's a, the plat came first.** And so, umm, [...] The way that people have understood the Occupy- the Jefferson Park, to be, is always been, umm, in our experience, of people in the city that I know, umm, it was owned by the railroad company, and then leased to the city as a park. Umm, if you look at the map, and how he described it, I highly doubt that the park would be established after, umm, the lease, and then include just a little strip of just the park where the sidewalk is. And then also have in that lease for the park mentioned of the, railroad company property being the other part of the park. **So, umm, the railroad company doesn't go to the curb. The park doesn't go to the curb. None of the, uhh, umm, documents that I ever found anywhere had any, umm, issues with going to the curb.** Umm, and so it's kinda like, it's a two fold. **One, uhh, even if the sidewalk is in the park, uhh, if it's not very, umm, well notated, or not notated at all,** say you're walking down from Rodizio Grill to a parked car, umm, on Linden, when you're walking down that sidewalk that starts off on the actual side of the road before if even gets into a grassy area, **how are you going to know that the park is closed?** And, umm, that both the sidewalks and the park are closed. And then, even worse, is the sidewalk that I was on, the night I was ticketed, umm, I wasn't even arguing on whether or not I can be on a sidewalk in a park, I was just arguing, look I'm not even in a park guys. You're trying to show me these maps, uhh,

**they don't have any legends on them,** I, I, I wish I could just accept and agree, but I also have rights, and that's one of those things that I learned in my past, is that if I don't exercise them, nobody will. And, umm, you know, I don't like the idea that if you're gonna linger in a sidewalk, that all of a sudden it may be construed as though you could be in a park. I think if you have a sidewalk, and it's open, you can do whatever you want, day or night, that's your sidewalk. That's the whole point. **It's called a right of way.** And so I counted it out, it's a 100 feet. Uhh, these guys, uhh, felt as though, based on the way that we were being treated, I think they just kinda wanted to remove us from the protest. They wanted to end it. You know, uhh, alleging that we were in violation. **Umm, but, uhh, what really concerns me is, uhh, umm, officers are supposed to be trained in right of way law.** It's very easy, you go online. There's plats, there's deeds, there's maps. That's- that should have been first before anything else. Uhh, he should be going and taking what I gave him, information wise, about when I talked to the streets department, and going and talking to the streets department, and being, like hey streets. [...] Umm, basically, not talking to anybody else, umm, uhh, let's see here, uhh, he even himself said it was- he referred to them as sidewalks. Umm, so, if you can't do that, and then also include definitions of parks and definitions of sidewalks, you're, I don't want to say, entrapping people, but you're really fooling people. And, just because you simply tell them that they're in violation of the law, doesn't mean jack diddly squat to all the other people that walk along that sidewalk, that aren't informed. And so, if they're not informed, through some other signage, then they have to be informed through somebody telling them, and then that becomes selective enforcement. **They only choose who they tell, and then all of a sudden you're in violation just because you were told.** I don't believe that's how it works. **You actually have to be in violation of an actual law.** Umm, they offered no actual statutes that I'm even in violation of, just simply a park. You guys don't even technically, don't even know if there is a park curfew violation to be had, umm, it's just simply, I don't think they even stated the actual statute number. So, for all intents and purposes, I don't think they've even presented anything that I'm even in violation of in the first place. I'm willing to admit that there's a park there. I'm willing to admit that park boundaries even close. I have no problem. I'm not trying to get out of a crime or anything. I'm just trying to go off of the facts, and the facts were not well established up to that point, of where the actual park boundaries were, and if they included sidewalks or not. Umm, the one thing that I absolutely need to make sure of, for the record, for anybody that ever reads this, is that these people were not respectful toward us. I know it has, it shouldn't have any bearing, but I wanted to just simply correct the defamation, umm, when I mentioned

to Giddings that I, umm, had gone to the streets department, the literal response that I got from him was, that's not true. Like, as if I didn't even go to the actual department. And, umm, it was just, like, I can't believe you that you actually did your homework or something like that. And the fighting that went on was basically him not believing me that I had done any homework, and then me fighting back saying, where's your homework. I've done more homework than you. And so, umm, you know, I really do appreciate him talking with me. We were able to work out a lot of things. Uhh, but we weren't able to come to any conclusions because, that's what we're talking about here today. Umm, they felt as though, them just simply telling us, with some map that they got from one department, and then that's good enough, umm, I respectfully reserve the challenge- or the right to challenge that, umm, without looking like I just, disobeying an order. I mean, that's the only way to challenge, is to take the ticket. So that's why I'm here. Umm, I didn't take it because I am trying to get out of it. Umm, the- you know, the one thing I could show you guy- I can hope for you guys, is that if you look at all the other sidewalks, uhh, the eight pictures I took, uhh, all along Linden Street, umm, they're all the same, and that's because they're all developed by the same people, the city, and I've spoken with many of them, even the people that did the construction, umm, they've always, all considered it right of way. [...] I'm sorry, it's kinda hard to speak my mind, umm. Just to clarify real quick, I did not join the protest until later, umm, all of the stuff that you may see in the pictures is not mine, I am not a messy person at all. I had a bike, with some gear on it, and a little seat that I sat on, you guys can probably see that in the footage. Umm, those pictures were of our friends that had their RV taken, they didn't have anywhere to put their stuff, and so, it does look bad, umm, but it's kinda hard when you don't know where else to go, and you're occup- you have to occupy land, and so that's why they did that. But, you know, umm, not that it should have any bearing, you know, stuff in a sidewalk. Umm, but uhh, they were, I think what I just wanna finish on is maybe, based on what they started off of, umm, absolutely if, uhh, overhead lights go on, and some cop is pulling me over, yeah, you're gonna pull over. Yeah, absolutely. If a cop did that to me, I would pull over. Umm, but then if he pulled me over and, uhh, said, hey man, umm, you got a headlight out, or hey man, your plates are expired, I'm gonna challenge that. I'm gonna say, hey man, you wanna take me to court on that, or you wanna go around the corner and talk about it, look at the plates, are they expired. And so, anybody that gets pulled over has a, you know, a right to respectfully disagree with an officer, and challenge the law, and that's not retaliation. That's not somebody trying to get out of it or get away with it. That could be potentially somebody that just simply tried their best to do more homework than what the cops were offering them. And, I don't know how else to exercise a right, but to actually exercise it. And so, I don't really know, umm, I hope that you guys don't deliberate based on the emotion of, well, all that matters is that, umm, that the defendant was actually first given a limitation. Umm, warnings are warnings, absolutely. Umm, the kind of warning that I think is getting confused here, is that there's a warning for when you keep giving it, their gonna ticket you for that. And so, umm, this warning was, umm, originally park curfew violation type warning. Umm, but that never got addressed, or, how would I put it, umm, the notice that was given actually has to be of an actual violation, and, I really don't see how they have provided any information whatsoever that I am actually in violation of anything. I almost want to, I would love to be guilty if I was actually in the park, umm, uhh, **but I have to stand up for anybody and everybody that's in a sidewalk that a cop wants to remove because the sidewalk just happens to be right next to a park. Umm, I don't think anybody, reasonable in their mind, is going to look at that sidewalk, and know themselves that it's closed, and then simply respect, just because a cop told them that, just 'cause a cop went to the parks department. Umm, like I said I went to other departments, I found other information. Umm, I don't believe I'm in violation of a rule or order. Umm, I hope that you guys can just, uhh, judge based on pure facts, and the facts are,**

## **there's no notices anywhere for sidewalks being**

**closed.** It's actually very confusing to anybody that's walking on either side of those streets, especially since it's downtown, to get confused into thinking that they're on a sidewalk. And, umm, even if they're confused about a sidewalk, if they go online and see a map, that shows a plat, a 100 foot right of way, other maps that all say the same thing, all show the same thing, even, uhh, maps from the same department that conflict. Umm, in this case, I was extra, extra careful to make sure that I was not on a controversial sidewalk, inside of a park. I went straight for, 100 foot right of way. I walked across it. Looks like a sidewalk, smells like a sidewalk, feels like a sidewalk. I didn't lick it, but I'm sure it tastes like a sidewalk. Umm, I don't know what else to say. I really hope uhh, that this, uhh, won't happen again,

that maybe you guys will get a better idea for how to, how to do their jobs, how to look at evidence, how to do investigations. Umm, it's a, you know, I, uhh, I, the reason I actually didn't call any witnesses, was because I actually didn't think I needed any. And the only ones I needed, or thought I would have needed, were umm, people that, umm, how do I put this, they were part of the city that had referred me to other parts of the city, and it all came down to, I need my own surveyor 'cause I can't use the city's surveyor, or so I thought at the time. And so, my survey was, I couldn't afford an actual surveyor, so I went out and I walked a 100 feet. And so, I would have absolutely brought in people, uhh, if I didn't think my, you know, 100 foot walk didn't have any value. And so, umm, last thing I could mention is, uhh, well there may be small, slight differences in the, umm, street, uhh, and how it goes along Linden Street, uhh, if you look at the map, uhh, H-1 I believe, umm, *the reason I took that shot is because it shows 100 feet all the way across, roughly, wherever you take that snapshot, so.* It would be one thing if we were talking about the Jefferson Street sidewalk, but, umm, 'cause that's not paved in such a way, umm, that this one had every indication that would fool you into thinking it's a sidewalk. Umm, planters, benches, umm, street names on the actual entrance-ways. [...] Thank you very much.”

**DESCHENES:** “The violation that we're talking about here is the violation of park curfew. **Umm, it was well posted** (UMM, NO IT WAS NOT!), uhh, it was, **Mr. Montgomery was told, twice before he was issued this ticket, that he had to respect the park hours and park boundaries.** Umm, I would disagree, respectfully, with Mr. Montgomery, that the only way to challenge is reading of, uhh, versus the reading of the parks department and Sergeant Giddings, and the police, was to take this ticket. Uhh, I believe that there are numerous options when we're dealing- perhaps too many options when we're dealing with, uhh, government planning and zoning, things like that, to make these determinations and to make these arguments, without willfully violating the law. Without, Mr. Montgomery says he took extra, he took extra extra careful to be on a non-controversial sidewalk. That ignores the fact that Sergeant Giddings told him, twice, before that night, that, that was a controversial sidewalk, that that sidewalk was within the park boundaries according to the police, **according to the park that's responsible for managing that property. Umm, responsible for enforcing park rules on that property.** And Sergeant Giddings gave these warnings, one because, maybe the- sure, if the signs do not say, Sidewalks Close, and it would be utterly unfair, umm, in the absence of any sort of notice, for the people to be ticked for being on a sidewalk that doesn't say that it's closed. (YEAH, THAT'S RIGHT! IT WOULD BE UTTERLY UNFAIR!) **That's why the statute, that's why the instruction you're looking at there, instruction ten, requires that law enforcement give notice, and that's exactly what Sergeant Giddings did.** (YEAH, EXCEPT THAT'S NOT WHAT THE STATUTE SAYS! FIRST, THAT'S NOT WHAT THE UNDERLYING MUNICIPAL CODE ORDINANCE SAYS, AS IT REQUIRES “DESIGNATION AND POSTEDNESS” AS CLEARLY EXPLAINED BY JUDGE KATHLEEN LANE ON MARCH 17, 2016. BUT MORE IMPORTANTLY, YOU KNOW YOURSELF THAT THE UNLAWFUL CONDUCT ON PUBLIC PROPERTY JURY INSTRUCTIONS ORIGINALLY HAD THE WORDS “PROMINENTLY POSTED” IN THEM, BUT WHEREBY YOU CONSCIOUSLY AND MALICIOUSLY CHOSE TO OMIT THEM PRIOR TO TRIAL, JUST SO YOU WOULDN'T HAVE TO DEAL WITH THEM LATER, LIKE RIGHT NOW FOR INSTANCE! HOW INTELLECTUALLY DISHONEST CAN YOU GET?!?!? IF ONLY THE JURY KNEW THAT YOU HAD OMITTED SUCH IMPORTANT WORDING, MAYBE THEY WOULDN'T HAVE WRONGFULLY CONVICTED WILLIAM IN THE MATTER!) *He did so on the 13th of September, he did so on the 14th of September, and spent 45 minutes speaking with Mr. Montgomery about the nature of the park boundaries, about the hours of the park, and about is- about why, if Mr. Montgomery returned, he would be ticketed. Mr. Montgomery returned, and was ticketed. There's no controversy, there was no surprise. Umm, and, uhh, all this again, this is clear from the video footage. You also received in exhibit two, another video, uhh, this is from another police officer, uhh, who was going to the scene, uhh, and walks the park as well. Uhh, what's informative about this is at very beginning, Mr. Montgomery, during his testimony, alleged that he was waiting patiently in his chair for the police, to show up so that he could have another, uhh, debate over the nature of the park boundaries, and receive his ticket so that he could- 'cause that was the only way he saw to challenge, uhh, his view of the law versus the legal system's view of the law. The, uhh, but the point of view camera shows, he was hanging out with other people in the park, and then when officers arrived, he walked to his chair, and sat down and started video taping. Umm, it's a small difference, but, it's telling. Uhh, the statutes don't mention sidewalks by name. The*

statutes don't mention a lot of things. Uhh, it's not the responsibility of law makers, thank goodness, to lay out every single iteration of every single possible violation, and anticipate everything that might go, might be part of a park. If statute doesn't include trees, that doesn't not mean that somebody can hang out in a tree after the park is closed, just because the statute doesn't mention it. Uhh, we have, as Sergeant Giddings testified, we have parks that have roads going through them, and when the parks close, those roads close. And when you are on those roads, and a law enforcement officer observes you, they will go and let you know the park is closed. And in 17 years, Sergeant Giddings did that. And in 17 years leading up to this ticket, leading up to this situation, only one person had continually disregarded the notice that Sergeant Giddings gave, and requiring him to give the ticket. Umm, you get to judge the credibility, you get to just the evidence. Uhh, and, uhh, you get to apply it to the law. **I would say that when an officer notifies you that the sidewalk is part of the park, and the park closes at 11, and reopens at 5am, and tells you in the future, please don't camp out in the sidewalk, that is effective notice.** (NO, THAT IS NOT! ACCORDING TO MUNICIPAL COURT JUDGE KATHLEEN LANE, ACTUAL "DESIGNATED AND POSTED" SIGNAGE IS ONLY CONSIDERED TO BE EFFECTIVE NOTICE!) **And under the instructions you see, instruction ten, that is exactly what the statute requires.** (AGAIN, THAT IS NOT EXCLUSIVELY WHAT THE STATUTE REQUIRES! YOU CONSCIOUSLY AND MALICIOUSLY TAILORED SAID JURY INSTRUCTIONS TO ERRONEOUSLY REFLECT AS SUCH!) **And that is what Mr. Montgomery was given, and that is what he ignored, and he did so intentionally.** Umm, I encourage you not to reward that. Umm, there's no confusion about the warnings that he was given. The only confusion that is occurring is being injected into this situation by Mr. Montgomery, uhh, bringing in, uhh, trying to bring in statements that- from that are not here, bringing in old maps that he downloaded from the internet, umm, **that don't have, don't have any province that we can track down, or that weren't provided to us at least today,** (AGAIN, WHERE'S BUD BREDEHOFT? WHERE'S YOUR PARKS DEPARTMENT EMPLOYEE THAT WOULD NEED TO ACTUALLY SUBSTANTIATE YOUR BLATANT HEARSAY OTHERWISE?!?!?) **and against that, he's asking you to ignore a law enforcement officer's doing his job. That did his due diligence. Who asked the parks department for just those park boundaries, received them, and employed them.** So ladies and gentlemen, uhh, when you go back to that room. again, thank you very much for your time, for your patience, it's been a long day. Uhh, it's not a very exciting process much of this, but I thank you very much for coming in and spending your day with us, paying attention to this case. Uhh, I encourage you to return a verdict of guilty. Thank you."

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**ON JUNE 2, 2016, AT 11:25PM,** William had observed several members of the public congregating on and around the publicly owned and maintained right-of-way sidewalk of Linden Street that he and his brother had been wrongfully arrested on that morning of September 15, 2015, as well as within the official, lease-based boundaries of the nearby Jefferson Street Park, and proceeded to report to the Fort Collins Police Department, via a phone call into their dispatch, the illegal park-curfew-violative behavior that he had been observing.

First, **AT 11:32PM,** William took a picture of these people that he had noticed eating pizza in and around the park (see [William Reports To The Police People Eating Pizza In And Around The Park](#)).

Then, a minute or two later, **AT 11:33PM,** he observed Fort Collins Police Department Officers Michael Harres and Dalton Brown arrive at Jefferson Street Park (see [Officers Harres And Brown Are Dispatched To The Park To Investigate](#)), whereby **he observed them inform and require the people eating pizza located within the official lease-based boundaries of the park to exit that particular area, but do nothing to inform the people eating pizza located exclusively within the publicly owned and maintained sidewalk of Linden Street that they were otherwise required to exit that particular area.**

**He observed the officers let those people stay precisely where they were.**

Directly after the officers left the area, **AT 11:39PM**, William took another picture of the remaining people eating pizza that were still located exclusively on the publicly owned and maintained right-of-way sidewalk of Linden Street (see [The Police Remove People From The Park But Let Those In The Sidewalk Stay](#)), as proof that they had been allowed to remain and eat their pizza there.

**A FEW MINUTES LATER**, William called back into **Fort Collins Police dispatch** to inquire as to why the people eating pizza in the publicly owned and maintained right-of-way sidewalk of Linden Street were allowed to remain where they were, of which **the dispatch operator** informed him, in clear and unambiguous terms, that ***“that's city property, and not part of the nearby park.”***

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**ON JUNE 8, 2016, AT 10:02AM**, William and David visited **the City Of Fort Collins Parks Department**, located at 413 S Bryan Ave (see [Visit With The Fort Collins Parks Department Regarding Jefferson Street Park](#)). There, they spoke with **Parks Department Ranger Bud Bredehoft**, and asked him if they could obtain a copy of the red-and-green-line, internal-use-only, service-related, maintenance-based “map” of Jefferson Street Park that Ranger Bredehoft had originally provided to Sergeant Giddings during the Occupy Jefferson Protest back in September 2015.

After visiting for awhile, Ranger Bredehoft informed William and David that **Parks Department Life Cycle Coordinator, Jill Wuertz**, who he believed had created the red-and-green-line map, is known to produce her maps for internal purposes only, or in his exact words, that ***“She's just doing it for the parks crews.”***

Later in their conversation, referring to the “map” that he had originally provided to Sergeant Giddings, Ranger Bredehoft said to William and David, ***“I don't know who he checked with, if he's saying one thing and another, but, he asked for a map and that's the map.”***

Then, continuing to refer to the original red-and-green-line “map” that he had now been unable to find for William and David, Ranger Bredehoft said to them, ***“The files I looked at, it's not in there.”***

Ranger Bredehoft then clarified his position even further, saying to them, ***“I don't know, yeah, where you actually nail down the official, official [boundaries of the park].”***

William and David eventually asked Ranger Bredehoft once again if he knew if the green lines in the red-and-green-line “map” in question was considered the “official” boundary map of Jefferson Street Park, to which Ranger Bredehoft responded to them by saying, ***“No, I'm going to have to check this one now, because I thought that was public.”*** (Just prior to this point in the conversation William, David, and Ranger Bredehoft had

been discussing the publicly owned and maintained right-of-way sidewalk of Linden Street at issue that they had been ticketed on, so Ranger Bredehoft was referencing that same strip of land when making said comment.)

Later in their conversation, William asked Ranger Bredehoft once again, *“So if Giddings asked for that map again, you guys would have to go find it?”* To which Ranger Bredehoft responded, *“I’d have to go find the one that I gave him. I don’t know where I got it.”*

Then Ranger Bredehoft finished his visit with William and David by saying to them a final time (again, regarding his position on the red-and-green-line “map” being considered an “official” boundary map of Jefferson Street Park or not), *“I can’t say that, that is the official, exactly the thing, because I don’t know myself.”*

**After that, William and David left the building, but without ever gaining access to the red-and-green-line “map” that had originally been provided to Sergeant Giddings during the Occupy Jefferson Protest back in September of 2015.**

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**ON JUNE 15, 2016, AT 2:29PM,** William and David followed up with [Director Of Parks Mike Calhoon](#) and [Park Ranger Bud Bredehoft](#) down at the [Fort Collins Parks Department](#) (see [Follow Up Visit With Mike Calhoon And Bud Bredehoft](#)). The four of them discussed in great detail all the pertinent issues leading up to this point regarding the glaring discrepancies caught between the red-and-green-line map originally obtained by Sergeant Giddings, and everything else – maps, plats, leases, etc. – discovered since.

**Toward the end of their conversation, Mike Calhoon admitted that he “searched everywhere,” but was unable to locate the red-and-green-line map originally provided by their department to Sergeant Giddings, and that the green-line-only “FAT” map he had recently provided to William via email was the only map they currently had available for viewing otherwise.**

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**ON JUNE 22, 2016, AT 3:45PM,** William spoke on the phone with [Fort Collins Parks Department Life Cycle Coordinator Jill Wuertz](#) (see [Phone Call With Jill Wuertz \(Parks Department Life Cycle Coordinator\)](#)). He wanted to know more about the red-and-green-line, internal-use-only, service-related, maintenance-based “map” of Jefferson Street Park that had previously been provided by their Parks Department Ranger Bud Bredehoft to Sergeant Giddings, and what exactly the different red and green lines contained within it meant.

Jill informed William that *“One of those is probably a parcel line, umm, so that includes ownership, umm, but one of them might be a maintenance boundary. Especially if it goes to a curb, or something like that, that includes right-of-way, but a lot of times we maintain tree longs in the right-of-way, and things like that.”*

Later, Jill finished her conversation with William by saying to him, *“So we maintain two different polygon files. One of which is an ownership*



***file of the exact parcel boundary, and the other is more like a maintenance boundary.”***

Then, a couple of days later, **ON JUNE 27, 2016, AT 3:59PM**, William followed up with Jill Wuertz again via phone (see [Follow Up Phone Call With Jill Wuertz \(Life Cycle Coordinator\)](#)), after further exchanging emails with her on the subject (see [Email Exchange With Jill Wuertz Regarding Maintenance Maps](#)).

During this final conversation with Jill, William asked her, ***“So you guys actually mark off the sidewalks, umm, so they know where to service the sidewalks.”*** To which Jill said in response to him, ***“Uh huh, yep. That area we take care of.”***

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**ON JUNE 23, 2016, AT 2:24PM**, William visited [the City Of Fort Collins GIS Department](#), located at 215 N Mason St (see [Visit With The Fort Collins GIS Department Regarding Jefferson Street Park](#)). There, he spoke with [GIS Department Programmer Tim Morales](#), who confirmed with him that **the original GIS department official boundary map of Jefferson Street Park** (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Pre 2016\)](#)) that was being offered at that time to the general public via their website portal, [gisweb.fcgov.com](#), and to other city departments via the “polygon files” located on their internal servers, **was actually incorrectly drawn**, just as William had specifically pointed out to him, and to which had erroneously included within it the aforementioned railroad track area located directly to the east of the park, and the northeast parking lot located directly to the northeast of that.

In [Tim Morales'](#) own words, he said to William after he noticed the pointed out discrepancies, ***“So somebody has drawn the park incorrectly.”***

**The Fort Collins GIS Department then subsequently revised their official boundary map of Jefferson Street Park to reflect the removal of the aforementioned discrepancies, and re-released a final, updated version of the map and its associated polygon file** (see [Jefferson Street Park \(Fort Collins Official GIS Department Map Circa Post 2016\)](#)) to be accessible by the general public and other city departments via their physical office and website portal, [gisweb.fcgov.com](#).

**This final, most-correctly-drawn, circa post 2016, official GIS Department boundary map of Jefferson Street Park was strictly rectangular in shape, did not include within it any discrepancies whatsoever of either an adjacent railroad track area or a northeast parking lot, and of course, naturally did not include within it (as it never once did before) the publicly owned and maintained right-of-way sidewalk of Linden Street that the green-line-based, internal-use-only, maintenance-based, service-related Parks Department “map” had included within it.** It was finally, after several years of being incorrect and the source of so many problems, 100% consistent in size and shape with the truly original, “most official,” lease-based boundaries of the park as first established back on October 25, 1995.

This GIS-department-based, circa-post-2016, 100%-correct-in-all-ways, official boundary map of Jefferson Street Park remained accessible to the general public and to other city departments until the park was finally decommissioned on October 26, 2016.

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**ON SEPTEMBER 23, 2016**, William filed an appeal in his [Unlawful Conduct On Public Property case](#) (see [William Files An Opening Brief In His Unlawful Conduct On PP Appeal](#)). At the time, William was not as experienced with law as he may be now, and he was still proceeding *pro se* as a result of being burned by the Public Defender's office years prior, but none of that matters **because he was able to, at the very least, provide precisely the sort of "clear and convincing" evidence that would otherwise be needed for the Larimer County District Attorney to be able to overturn his wrongful conviction with (and likewise charge Sergeant Giddings with perjury with) independent of any appellate process taken.**

In William's appeal, he explained in clear and unambiguous language that the prosecution wrongfully convicted him using non-cross-examinable, non-admissible evidence, that Bud Bredehoff was never subpoenaed to the stand in order to actually verify the otherwise unsubstantiated, entirely-hearsay-based claims brought forth by Sergeant Giddings, that he had personally followed up with the staff at the Parks Department who were unable to provide him with the original red-and-green-line map to which they had once provided Sergeant Giddings, that he spoke with the very creator of the red-and-green-line map who had explained to him that it was meant for internal-to-her-department, service and maintenance purposes only, that he had since obtained the correct boundaries from the correct department, that he had even personally corrected the very "polygon file" discrepancy within that department to which had originally caused such confusion over at the other department, that the prosecution incorrectly instructed the jury by omitting references to "designation and postedness" in complete contradiction to case law that had just been established at the municipal court level over the exact same issue, and that he and his brother had eventually found the actual lease and lease transfers themselves for the property. All information offered in his appeal also included references to attached exhibits regarding each conclusion made, thereby constituting, unequivocally, the "clear and convincing" evidence needed to overturn his wrongful conviction with.

**It is truly shocking that a District Attorney's office would continue to maliciously prosecute somebody after personally handling such obvious, independently verifiable, conclusive, and plainly exculpatory information. But as you will soon find out, that is exactly what they did...**

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**ON DECEMBER 1, 2016, AT 5:19PM**, William attempted to file a formal complaint against Sergeant Giddings, with [Lieutenant Daniel Murphy of the Fort Collins Police Internal Affairs Department](#) (see [Lieutenant Murphy Tells Me To Put It In Writing](#)). **Right away, Lieutenant Murphy refused to speak with William, instead demanding that he "put it in writing."** This demand was a direct violation of his Internal Affairs Policy No. 1020.3, which explicitly states: "Although written complaints are preferred, a complaint may also be filed verbally either in person or by telephoning the Agency and will be accepted by any employee."

William called [Lieutenant Murphy](#) again, **ON DECEMBER 9, 2016, AT 5:00PM**, but was hung up on, again (see [Phone Call With Lieutenant Murphy \(Police PSU\) But He Hangs Up On Me Again](#)).

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**ON JANUARY 3, 2017**, the [District Court Judge Stephen Howard](#) denied William's appeal in his [Unlawful Conduct On Public Property case](#) (see [District Court Judge Stephen Howard Denies William's Unlawful Conduct Appeal](#)).

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**ON JANUARY 4, 2017**, the Chief Deputy Larimer County District Attorney David Vandenberg filed an answer brief in William's Unlawful Conduct On Public Property appeal (see [The District Attorney Files An Answer Brief In William's Unlawful Conduct Appeal](#)). **Despite having access to conclusive and verifiable, "clear and convincing" evidence of William's innocence that he had just provided to his office via his opening brief in the matter, Deputy District Attorney Vandenberg ignored the plainly exculpatory information, and instead continued to cover up William's wrongful arrest and conviction.**

The following are direct quotes taken from Deputy Vandenberg's answer brief, **and to which capture precisely just how intellectually dishonest and corrupt his office has become** with regards to disputes of fact and disputes of law:

***"The area where the defendant was located on September 15, 2015 during the hours Jefferson Park was closed was within the park boundaries."***

(UMM, NO IT WAS NOT! SERIOUSLY, HOW CAN YOUR OFFICE CONTINUE TO REACH SUCH BLATANTLY CONTRADICTIONARY CONCLUSIONS IN THE FLYING FACE OF NOT JUST CONVERSATIONS THAT YOU NOW KNOW TOOK PLACE BETWEEN WILLIAM AND THE PARKS DEPARTMENT REGARDING THIS EXACT DISPUTE, BUT ALSO THE VERY LEASE FOR THE PROPERTY WHICH INCLUDES ITS VERY OWN BOUNDARY MAP OF THE PARK – BOTH OF WHICH WERE EXPLICITLY MENTIONED TO YOU IN HIS OPENING BRIEF!)

***"[T]he map was not introduced into evidence but rather was merely used demonstratively."***

(YEAH, BUT SERGEANT GIDDINGS' UNSUBSTANTIATED, PERJURED, HEARSAY TESTIMONY OF THE MAP AND ITS PURPORTED OFFICIALNESS WAS UNLAWFULLY INTRODUCED INTO EVIDENCE!)

***"The map in question showing the boundaries of the park was merely a visual demonstration of information which Sgt. Giddings had otherwise already testified to."***

(RIGHT... JUST 'MERELY' A VISUAL DEMONSTRATION, HUH? AND ALSO, WHO CARES WAS SERGEANT GIDDINGS "TESTIFIED TO" – HEARSAY IS HEARSAY IS HEARSAY IS HEARSAY!)

***"[T]here is no possibility, let alone a reasonable one, that the People's use of the 'red and blue map' for demonstrative purposes only, meaningfully contributed to or even had a logical connection to the defendant's conviction in this matter."***

(OH MAN, ARE YOU FREAKING KIDDING ME? HOW DO YOU PUSH SUCH SLUDGE PAST YOUR BRAIN? IT WAS THE SOLE REASON I GOT CONVICTED! YOU REALLY THINK THAT THE JURY WOULD HAVE STILL CONVICTED ME WITHOUT SEEING THAT MAP? ACTUALLY, YOU ARE CORRECT, IT DOESN'T MATTER ABOUT THE VISUAL USE OF THE MAP "FOR DEMONSTRATIVE PURPOSES ONLY," I GOT CONVICTED VIA SERGEANT GIDDINGS' UNDERLYING HEARSAY TESTIMONY REGARDING IT, WHICH IS JUST AS BAD AS OFFERING A VISUAL REPRESENTATION OF IT!)

***"Even assuming arguendo the map constituted hearsay evidence, there is no possibility that its admission contributed to the defendant's conviction for the reasons stated immediately above."***

(EVIDENTLY INTELLECTUAL DISHONESTY KNOWS NO BOUNDS!)

***"The defendant generally challenges the sufficiency of the evidence. The evidence at trial demonstrated that the park was closed during the hours the defendant was found to be in the***

***park, that the defendant was informed of the fact that he could not be in the park during the closed hours, and that the park's boundaries included the area in which he was contacted on September 15, 2015. He was given multiple warnings prior to September 15, 2015 as well as education regarding the parks' use restrictions and boundaries. The above constituted substantial evidence from which any reasonable juror could conclude that the People had proven beyond a reasonable doubt that the defendant was guilty of the charged offense."***

(MAN, YOU LITERALLY HAVE NO IDEA WHAT THE DEFINITION OR CONCEPT OF "EVIDENCE" IS. UNSUBSTANTIATED, PERJURED, HEARSAY TESTIMONY **IS NOT EVIDENCE!** COLORADO RULES OF EVIDENCE **RULE 802** WAS SPECIFICALLY PUT INTO PLACE TO PROTECT AGAINST JUST THIS SORT OF BLATANTLY UNACCEPTABLE FRAUD AND CORRUPTION!)

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**ON JANUARY 10, 2017, AT 2:29PM,** William spoke on the phone with Lieutenant Craig Horton of the Fort Collins Police Internal Affairs Department (see [Full Internal Affairs Phone Report To Lieutenant Horton \(Police PSU\)](#)). **Finally, he was able to lodge a formal complaint against Sergeant Giddings, despite his prior unsuccessful attempts made with Lieutenant Murphy.** (At [timestamp 19:35 minutes](#) is where William begins to report his complaint against Sergeant Giddings.)

During his complaint, William informed Lieutenant Horton, in clear and unambiguous language, that Sergeant Giddings had erroneously obtained the incorrect boundaries for Jefferson Street Park from the wrong city department, that those incorrect boundaries had erroneously been imported into that wrong department from a different department, that that different department had originally incorrectly drawn them in the first place hence all the confusion, that he and his brother had since obtained the correct boundaries for the park from the correct department, that they had personally corrected the aforementioned discrepancy that originally caused such confusion, that they had even discovered the original lease for the park which also reflected the correct park boundaries, and that they were ultimately ticketed while standing exclusively within the publicly owned and maintained 100-foot right-of-way sidewalk of Linden Street as originally established in the city's 146 year old plat. William further explained that Sergeant Giddings wrongfully convicted him in County Court using perjured and unsubstantiated hearsay to which Giddings had already tried to use (but was unsuccessful in using) in his failed attempt to wrongfully convict David in his Municipal Court trial over the exact same issue.

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**ON FEBRUARY 19, 2017, AT 4:37PM,** William left three back-to-back voicemails for Fort Collins Police Sergeant Sean Giddings, explaining the entire situation that he and his brother had uncovered up to this point, **and otherwise pleading his innocence and asking for help with overturning his wrongful conviction that he had unlawfully secured against him** (see [Three Voicemails Left For Sergeant Giddings \(Who Ended Occupy Jefferson\)](#)).

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**ON APRIL 6, 2017, AT 4:29PM,** William left a voicemail for Fort Collins Chief Of Police John Hutto, likewise explaining the entire situation that he and his brother had uncovered up to this point, **and likewise pleading his innocence and asking for help with overturning his wrongful conviction** (see [Voicemail Left For John Hutto \(City Of Fort Collins Chief Of Police\)](#)).

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**ON APRIL 10, 2017,** William received a letter from Sergeant Jackie Pierson of the Fort Collins Police Internal Affairs Department in response to the complaint he had recently lodged against Sergeant Giddings (see [Internal Affairs Response From Sergeant Jackie Pierson Regarding William's Complaint](#)).

**Suffice it to say, Lieutenant Horton failed miserably to conduct a thorough, fair, and impartial investigation, because as a result, William's complaint was returned as apparently unfounded (despite the literal mountain of conclusive, exculpatory, and independently verifiable evidence he had otherwise provided him to the exact contrary).**

**According to Sergeant Pierson, "After thorough, lengthy review of the information you provided, court transcripts and other documents and interviews of involved officers, the investigation revealed that no FCPS officer violated FCPS policy and each officer was exonerated of any alleged policy violation."**

(RIGHT... LIKE A FORT COLLINS POLICE OFFICER DIDN'T JUST COMMIT VERIFIABLE PERJURY IN ORDER TO WRONGFULLY CONVICT AN INNOCENT PERSON FOR STANDING IN A SIDEWALK LOCATED OUTSIDE OF A PARK. THAT'S NOT JUST A POLICY VIOLATION, THAT A CRIMINAL VIOLATION! NOW, WHAT STARTED OFF AS A SIMPLE WRONGFUL CONVICTION HAS TURNED INTO A MASSIVE, SUPREMELY UNLAWFUL COVER UP!)

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**ON APRIL 14, 2017, AT 1:04PM,** William spoke on the phone with Fort Collins Parks Department Manager Of Parks Steve Lukowski (see [Phone Call With Steve Lukowski \(Parks Department Manager\)](#)). He was interested in confirming with the Parks Department if they were, in fact, "the official source for park boundaries," as Sergeant Giddings had alleged and eventually testified to, or not.

**Steve Lukowski confirmed for William, without issue, that their department was indeed not the official source for park boundaries within the City Of Fort Collins.**

Their conversation can be summed up best by quoting, verbatim, the last recorded portion of it:

**WILLIAM: "Uhh, but basically, you guys aren't the official source of boundaries of park maps is kinda what I'm trying to get at, 'cause that's what one cop in your city said one time."**

**LUKOWSKI: "Yeah, that sounds pretty accurate."**

**WILLIAM: "Yeah, just kinda, real basic stuff, so."**

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**ON MAY 4, 2017, AT 1:32PM,** William left two back-to-back follow up voicemails for Sergeant Pierson of the Fort Collins Police Internal Affairs Department, expressing his dissatisfaction with her department's findings, and further explaining (in excruciating detail, once again) how he and his brother had been maliciously prosecuted by Sergeant Giddings during and after the Occupy Jefferson Protest (see [Two Voicemails Left For Sergeant Pierson \(Police Professional Standards Unit\)](#)).

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**ON MAY 10, 2017, AT 12:38PM,** William left [three back-to-back voicemails](#) for [Fort Collins City Manager Darrin Atteberry](#), further explaining the entire situation that he and his brother had uncovered up to this point, **and further pleading his innocence and asking for help with overturning his wrongful conviction** (see [Three Voicemails Left For Darrin Atteberry \(Fort Collins City Manager\)](#)).

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**ON MAY 26, 2017, AT 2:17PM,** William and David held a meeting at the [Fort Collins Municipal Courthouse](#) with the [Fort Collins City Attorney Carrie Daggett](#) and [Assistant Chief Of Police Kevin Cronin](#) (see [Meeting With Carrie Daggett \(City Attorney\) And Kevin Cronin \(Deputy Chief\)](#)). **During this meeting, they discussed all the fraud and corruption they had endured leading up to this point in their lives, including all the previous unsubstantiated charges levied against them, and then eventually talked about the Occupy Jefferson Protest and William's wrongful conviction in the matter** (see [timestamps 33:37 minutes to 38:55 minutes](#)).

In clear and unambiguous language, William and David explained to Carrie Daggett and Kevin Cronin that Sergeant Giddings was 100% mistaken regarding the boundaries of Jefferson Street Park, that he had erroneously obtained them from the wrong department, that they had personally followed up with that department and spoke with the staff there who explained to them that Sergeant Giddings had only been given a maintenance map for the park and that they were by no means the official source for park boundaries within the city, that they had since obtained the correct boundaries from the correct department, that they had eventually found the actual lease itself for the property, and that they were ultimately ticketed while standing exclusively within the publicly owned and maintained 100-foot right-of-way sidewalk of Linden Street as originally established in the city's 146 year old plat. They further explained that Sergeant Giddings wrongfully convicted William in County Court using perjured and unsubstantiated hearsay to which he had already tried to use (but was unsuccessful in using) in his failed attempt to wrongfully convict David in his Municipal Court trial over the exact same issue, and that when William appealed his County Court conviction, that the Larimer County District Attorney effectively "ratified" that the boundaries unlawfully submitted by Sergeant Giddings were now, in fact, the official boundaries for Jefferson Street Park (even though they're unequivocally not) and that the Fort Collins Parks Department, was now, in fact, the official source for park boundaries within the city (even though it's unequivocally not).

This hefty amount of information provided to the City Attorney and Deputy Chief was absolutely, without a doubt, more than enough information to overturn William's wrongful conviction with in the matter (and to likewise charge Sergeant Giddings with perjury with). **But alas, the City, just like the County, just couldn't put its pitchfork down...**

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**ON JUNE 27, 2017, AT 1:20PM,** William spoke on the phone with [Lieutenant Jarred Kinsman](#) of the [Fort Collins Police Internal Affairs Department](#), further discussing the fraud and corruption that he and his brother had caught up to this point, including their dissatisfaction with his department's recent findings regarding Sergeant Giddings misconduct (see [Phone Call With Lieutenant Kinsman \(Police Professional Standards Unit\)](#)).

**During this conversation, Lieutenant Kinsman attempted to unlawfully shift his department's duties to that of the courts by trying to convince William that it was not his job to look into what William was reporting.** William responded by saying that, according to his department's policies, he and his constituents were required to investigate into both policy-based and criminal-based violations of their officers when the issues alleged boil down to more than just a difference in opinion regarding the guilt or innocence of somebody going through the court system. **Lieutenant Kinsman then told William to "put it in writing" – just as Lieutenant Murphy once did,** and to which William responded by saying that requiring him to do so was also a violation of his department's policies, and whereby

he has every right to lodge verbal complaints, especially considering how behind he and his brother currently were with regards to their life / medical / legal paperwork.

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**ON JUNE 27, 2017, AT 2:33PM,** William left two follow up voicemails for Lieutenant Kinsman of the Fort Collins Police Internal Affairs Department, and while calling in to leave a third one, actually got him on the phone again (see [Two Voicemails Left For, Then Phone Call With Lieutenant Kinsman \(Police PSU\)](#)). Unfortunately, during William's his conversation with the officer, the truth finally came out – that the reason he wasn't being taken seriously was **because the department had officially labeled him a “lawsuit scammer.”** This was, without a doubt, one of the saddest moments in William's life, considering how he and his brother had tried so hard, for so long, to just be normal, law abiding, objectively reasonable, genuine U.S. citizens with regards to their concerns, with only the high hopes in mind that they could maybe produce a little reform within their community, or to otherwise at the very least hold individual officers accountable to the very standards they hold everybody else to.

The following are direct quotes taken from Lieutenant Kinsman during the conversation held between him and William:

*“Can I ask you a question, William? When are you gonna stop calling us and asking us to respond to your questions and go ahead and file your suit so we can take this to a court and you can hear from a judge versus us?”*

*“Stop calling here and trying to bait us.”*

*“You're trying to set the police department up to say things or do things, so that you can then go sue us on a technicality.”*

*“That's you not acting as a responsible citizen, that's you trying to take advantage of some technicalities in a court room.”*

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**ON JULY 17, 2017,** William received a letter from Lieutenant Jarred Kinsman of the Fort Collins Police Internal Affairs Department in response to the multiple complaints now lodged against several police officers within the city (see [Letter From Lieutenant Kinsman Outright Denying William's Internal Affairs Claims](#)). In his letter, **Lieutenant Kinsman officially closed the door on William** regarding his complaints, all while violating his own policies in the process.

The following are some of the responses given by him (and my personal reaction to them):

*“I am writing you to inform you of the outcome of my investigation into the allegations made in your complaints recently submitted to me. While I understand that you have been frustrated with your past contacts with Fort Collins Police Services employees, I am limited to investigating complaints that involve violations of Police Services' policies. Your recent complaints do not rise to this level but appear to just be your disagreement with past internal affairs decisions or matters which, at this point, can only be addressed through some legal process.”*

(ACTUALLY, YOU ARE OBLIGATED TO INVESTIGATE INTO NOT JUST ALLEGED POLICY VIOLATIONS, BUT CRIMINAL VIOLATIONS AS WELL, AS YOUR INTERNAL AFFAIRS POLICY NO.

1020.5 EXPLICITLY STATES: “EMPLOYEES MAY BE SUBJECT AN ADMINISTRATIVE INVESTIGATION AND/OR A CRIMINAL INVESTIGATION TO DETERMINE THE FACTUAL BASIS OF ANY COMPLAINT.” THIS SHOULDN'T MATTER, OF COURSE, AS OBTAINING THE WRONG MAP FROM THE WRONG DEPARTMENT IS SURELY A VIOLATION OF YOUR INTERNAL POLICE POLICIES. BUT NEVERTHELESS, SERGEANT GIDDINGS COMMITTED VERIFIABLE PERJURY DURING BOTH DAVID'S AND WILLIAM'S TRIALS, WHICH YOU MOST CERTAINLY HAVE AN OBLIGATION TO INVESTIGATE AND CHARGE HIM WITH COMMITTING, IF YOU SO DISCOVER THAT SUCH HAD HAPPENED.)

*“[I]n your voicemail message you indicate that you still disagree with the City's determinations made regarding the circumstances surrounding your contact with Sergeant Sean Giddings on September 9, 2015 (Ref: FCPS Case 15-14955). I have reviewed your complaint concerning Sergeant Giddings and found that Lieutenant Craig Horton conducted and completed a thorough investigation of your complaint and that Sergeant Jackie Pierson sent you a memo dated April 10, 2017 notifying you of the outcome of Lieutenant Horton's investigation. Therefore, this investigation is concluded.”*

(IT'S REALLY A SHAME THAT SO MANY CRONIES EXIST WITHIN YOUR POLICE FORCE, FOR IF YOU ACTUALLY KNEW WHAT YOU WERE DOING, YOU WOULD HAVE EASILY CAUGHT THE FRAUD AND CORRUPTION REPORTED HEREIN. YOU HAVE ALL TRULY FAILED TO COMPREHEND EVEN THE MOST BASIC OF FACTUAL DISPUTES, INCLUDING YOUR VERY OWN PUBLISHED PARK BOUNDARIES THAT YOU AS A CITY SELF-AUTHORED AND GAVE YOURSELF ACCESS TO, AND WHEREBY A REGULAR / LAYMAN CITIZEN EVIDENTLY HAD NO TROUBLE FIGURING OUT OTHERWISE!)

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**ON AUGUST 16, 2017**, Deputy Larimer County District Attorney William Starks filed a [Motion To Impose Suspended Sentence](#) in William's [Unlawful Conduct On Public Property](#) case (see [The Larimer County District Attorney Files A Motion To Impose 72 Day Jail Sentence](#)). The motion was triggered by a new charge brought against William of allegedly committing Disorderly Conduct on May 18, 2017. **Ironically, the primary reason for William being so upset in this new case was specifically because of the sheer amount of supremely unethical and perpetually sustained fraud and corruption he and his brother had endured up to that point regarding the very Occupy Jefferson Park boundary issue laid out in this report.**

**The truly scary thing now, is that soon the County Court will rule on such a motion, and potentially even further wrongfully prosecute William for purportedly committing a crime that he 100% verifiably, truly, really, actually, in fact, had not committed – all because both the City and County need to otherwise keep covering up their capital mistakes made in wrongfully charging and unlawfully convicting him the first place. (He's looking at spending **72 days** in jail for something that he flat out did not do!)**

## **What a government scandal this has become!**

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**ON DECEMBER 6, 2017, AT 11:56AM**, William visited the corner of Linden Street and Jefferson Street, and noticed that **a couple of “Sidewalk Closed” signs** had been placed along the publicly owned and maintained right-of-way sidewalk of Linden Street – the same public sidewalk that he and his brother had stood upon that morning of September 15, 2015.



It appeared that construction was being performed on the nearby parcel of land that was once sanctioned as Jefferson Street Park, and that the construction crews present needed to create a safety barrier for their vehicles and equipment to work within.

**One “Sidewalk Closed” sign was located about six feet away from where William’s brother had been standing** when he was wrongfully arrested that morning of September 15, 2015 (see [Linden Street Sidewalk Closed Sign Where David Had Been Standing](#)) and **the other “Sidewalk Closed” sign was located literally exactly where William had been standing** when he was wrongfully arrested that same morning (see [Linden Street Sidewalk Closed Sign Where William Had Been Standing](#)).

Then, while traveling through the area, William noticed **a survey pin** (see [Survey Pin @ Corner Of Linden Street & Jefferson Street](#)) buried in the asphalt at the northeast corner of the intersection of Linden Street and Jefferson Street, **which was located precisely where one would expect to find it** when portraying the exact parcel boundary for the nearby parcel of land located there at Linden Street and Jefferson Street.

**This survey pin was located at exactly the southwesterly point of the official, originally-drawn, lease-based boundaries of Jefferson Street Park as drafted up in its October 25, 1995 lease**, and was likewise located at the northerly edge of the 100-foot wide public right-of-way of Linden Street and thus 100% consistent with the placement of the aforementioned sculpturesque fence that runs along it.

**LATER THAT DAY** William visited the [City Of Fort Collins Zoning Department](#), located at 281 N College, and spoke with [the ladies at the front counter](#).

There, he obtained a copy of **the public right-of-way sidewalk closure / encroachment permit** (see [Linden Street Sidewalk Right-Of-Way Revocable Encroachment Permit Application](#)) required to be filed by the construction company, and to which had been approved by the city, in order to lawfully close the publicly owned and maintained right-of-way sidewalk of Linden Street at issue.

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**ON JANUARY 8, 2018, AT 10:49AM**, William spoke on the phone, one last time, with [Lieutenant Jarred Kinsman of the Fort Collins Police Internal Affairs Department](#) (see [Final Phone Call With Lieutenant Kinsman \(Police Professional Standards Unit\)](#)).

**During their conversation Lieutenant Kinsman, once again, requested that William “reduce down to writing” whatever it was that he was still trying to report to him. William responded by informing Lieutenant Kinsman, once again, that requiring him to do so would be a violation of his internal affairs policies.**

**Next, Lieutenant Kinsman claimed that he had already looked into all of Williams complaints anyways, that they have all been resolved by his department and each returned unfounded, and that ultimately William just needs “to move on and let it go.”**

William, still frustrated that he was wrongfully convicted in broad daylight using now ratified-as-official park boundaries that had originally been derived from a mere maintenance map, reduced what he was trying to say down to one simple question: **“Is the parks department the official source for park boundaries within the city, or is it not?”**

## **Lieutenant Kinsman wouldn't answer the question, thereby even further ratifying the conclusion that they were the official source (even though they're unequivocally not!).**

Suffice it to say, Lieutenant Kinsman failed at his job, completely, from beginning to end, to hold his officers even remotely accountable for their own wrongdoings.

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**ON JANUARY 8, 2018**, William reduced down to writing what he could manage with his limited time and resources, and started [an email chain between him and the Fort Collins Police Internal Affairs Department](#) (see [Final Email Report To Internal Affairs And Other Fort Collins City Members](#)). William originally addressed the email to Lieutenant Kinsman, in response to his internal-affairs-policy-violative request to “put it in writing,” however City Attorney Carrie Daggett was the first to respond.

## **Unfortunately Carrie Daggett failed miserably to comprehend even the most basic disputes of fact and law.**

(ALSO, BASED ON HER RESPONSES, SHE EVIDENTLY DIDN'T RECALL / INTERNALIZE / INVESTIGATE INTO THE VERY SPECIFIC CONVERSATION THAT SHE, KEVIN CRONIN, WILLIAM, AND DAVID HAD ALREADY HELD ON MAY 26, 2017 OVER THE SUBJECT, AS OUTLINED ABOVE – OTHERWISE SHE WOULDN'T HAVE WALKED HERSELF STRAIGHT BACK INTO SUCH EASY ARGUMENTS AGAINST HER OTHERWISE!)

**She claimed that “Police Services has reviewed [the] matter and concluded that Officer Giddings did nothing illegal or improper in deciding there was probable cause to issue you a summons at that time.”** William responded by reiterating what Municipal Court Judge Kathleen Lane had to say in the matter – **that the area was not properly designated and posted as a park, and that David was already found not guilty at the municipal court level after standing in the same exact sidewalk on the same exact evening as him.** He then explained that a cautious, prudent, objectively reasonable officer would have lacked probable cause to issue anybody a citation for standing within that particular Linden Street sidewalk, as the park curfew ordinance at issue specifically refers to the need for proper designated and postedness, not to the use of maps.

(ALSO, WHO CARES ABOUT PROBABLE CAUSE AT THIS POINT, WILLIAM WAS TRIED IN COUNTY COURT AT THE NEXT LEVEL UP OF PROOF BEYOND A REASONABLE DOUBT, WHICH OF COURSE, THE PROSECUTION FAILED TO LIVE UP TO CONSIDERING HE RELIED EXCLUSIVELY ON SERGEANT GIDDINGS' WHOLLY UNSUBSTANTIATED AND FULLY PERJURED HEARSAY TESTIMONY. SO REGARDLESS OF WHAT HAPPENED AT THE CHARGING STAGE, THE CITY AND COUNTY HAVE AN ETHICAL OBLIGATION, NOW, TO UNPOISON THE COURTROOM THAT IT SO POISONED.)

**Next, she claimed that “Since you raised the issue of the park boundaries in your Municipal Court case, the City Attorney’s Office did provide all the information we had about the map dispute and the actual location of the park boundaries to the District Attorney’s Office prior to the trial on your County Court case.”** William responded by reiterating that the GIS department map presented by David during his municipal court trial, and to which the Municipal Court Judge herself pointed out coincided exactly with the red lines in Sergeant Giddings' red-and-green-line map, was the more correct map that should have been researched and compared against by her office. **William even explained that the red lines in Giddings' red-and-green-line map were, in fact, drawn from the very polygon file of the very map of Jefferson Street Park imported into the Parks Department from the GIS Department.**

(ALSO, WHO CARES IF YOU ONCE ERRONEOUSLY RELIED ON WHAT TURNED OUT TO BE INCORRECT PARK BOUNDARIES – THAT NEVER JUSTIFIES PERPETUALLY MAINTAINING A WRONGFUL CONVICTION SHOULD YOU EVENTUALLY DISCOVER THE CORRECT PARK BOUNDARIES AFTER THE FACT. AS IN, YOU ALWAYS HAVE AN ETHICAL OBLIGATION TO OVERTURN A WRONGFUL CONVICTION ONCE THE TRUTH COMES OUT THAT SOMEONE IS ACTUALLY INNOCENT!)

Next, she claimed that *“If you felt the evidence presented by the District Attorney’s Office at your trial was incorrect or incomplete, that was an issue for you or your attorney to raise, challenge and/or present your own evidence on as part of your defense at trial, so that the judge or jury could decide the facts of the case.”* William responded by reiterating that he did present evidence of his own despite the burden of proof not being on him, and that he did challenge the state's evidence by raising the applicable issues, **but that it didn’t matter anyways because the prosecution was determined to wrongfully convict him anyways without presenting to the Court any real, actual, tangible, verifiable facts of their own** and whereby they instead relied exclusively on Sergeant Giddings' wholly unsubstantiated and fully perjured hearsay testimony being accepted otherwise.

(ALSO, JUST BECAUSE YOU UNLAWFULLY DUPED A JURY INTO BUYING YOUR PSEUDO-EVIDENCE, DOESN'T MEAN THAT ACTUAL EVIDENCE CAN'T STILL BE INTRODUCED FROM OUTSIDE THE COURTROOM. RULE 3.8(H) OF THE COLORADO BAR ASSOCIATION RULES OF PROFESSIONAL CONDUCT SPECIFICALLY MANDATES THAT WRONGFUL CONVICTIONS BE OVERTURNED WHEN A PROSECUTOR BECOMES AWARE OF “CLEAR AND CONVINCING” EVIDENCE OF A DEFENDANT'S INNOCENCE. AS IN, EVERYTHING DOESN'T JUST GET “LOCKED UP” IN COURT, AND VAMOOSH, ALL YOUR INDEPENDENT ETHICAL OBLIGATIONS AS ATTORNEYS ARE SATISFIED THENCEFORWARD!)

Next, she claimed that *“You had your right to a trial in your case, and you exercised that right, as well as your right to an appeal. We do not know what role the map issue played in your conviction. But If you failed to raise or effectively present your own evidence about the map and/or location of the right of way line at trial, or you did but the judge or jury did not find you credible or agree with you, that is not something Police Services or any other branch of the City government can assist you with at this point.”* William responded by reiterating that she should know better that the map issue was literally the sole reason why he got convicted in the first place – as he only stood within the green lines of the red-and-green-line map, but not the red lines, that morning of September 15, 2015. **Then he further explained that falsified evidence (like DNA evidence) is not appealable anyways,** and that the only way to overturn a wrongful conviction stemming from the malicious introduction of such fabricated evidence is to literally police oneself, and otherwise reinvestigate and reintroduce evidence on upwards from the bottom, **as well as hold police officers accountable with criminal charges like perjury should that be the reason for the wrongful conviction.**

(ALSO, IT APPEARS THAT CARRIE DAGGETT IS SUFFERING FROM THE SAME DEFAMATION THAT OFFICER GOLDEN AND THE CITY EMPLOYEES DID ON APRIL 5, 2016 – THAT SOMEHOW THE DISPUTE AT HAND WAS MERELY OVER THE EXACT LOCATION OF THE RIGHT-OF-WAY LINE (TO INDEED BE DEBATED USING SURVEYS) VERSUS A LARGER, MORE OBVIOUS DISPUTE OF HOW THE PUBLISHED PARK BOUNDARIES WERE OUTRIGHT INCORRECTLY SOURCED IN THE FIRST PLACE.)

The entire email chain is actually 22 pages long, with quite a few more details and references to evidence **(like even the very survey pin William found!)** hashed out within it. It is truly worth reading in its entirety, so as to get a complete picture of just how **downright willfully blind** the entire City Of Fort Collins has become to such a blatantly obvious and remarkably simple issue this whole park boundary thing actually is. So please consider reading it!

Suffice it to say, and despite all the hard work spent by William in attempting to bridge such gaps in communication, Carrie Daggett eventually closed the book on him too, saying in her final email on the subject, ***"This is to inform you that I don't consider further response to your emails productive and don't believe that further discussion of the issues you've continued to discuss and describe is likely be fruitful. Substantially all of the issues in your emails are matters to be resolved in court, if currently unresolved, and there is nothing further for the City to do with regard to them. In light of this, I won't be responding to each of your emails. This should not be construed to mean that I agree with the characterizations of fact or conclusions or allegations in your messages, as we continue to disagree about many of these points."***

**And of course, William never did receive a straightforward answer to his paramount question of whether the Parks Department is truly the official source for park boundaries within the city (or not!), let alone whether the map used by Sergeant Giddings during the Occupy Jefferson Protest is the official boundary map of Jefferson Street Park (or not!). You'd think that such simple, easily verifiable questions would not go unanswered, especially considering the fact that by not answering them, one could leave themselves wide open to liability for effectively "ratifying" the wrong information!**

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## **CONCLUSION:**

**From this point forward, for the next year onwards and into the present, William continues to maintain his innocence despite remaining wrongfully convicted by the Fort Collins Police Department and the Larimer County District Attorney. While he never did appeal his appeal – because of how he and his brother have continued to be witness tampered and further retaliated against in now dozens of other homeless and poverty related charges and malicious prosecutions that have been brought against them since (see [Statewide Police Ran 60+ Count Homeless Human Trafficking And Kidnapping Ring 100% Caught On Tape!](#)) – he still occasionally leaves voicemails for, and drops information packets off to, the Fort Collins Police Internal Affairs Department, the Fort Collins City Attorney, the Fort Collins Chief Of Police, the Fort Collins Citizens Review Board, and members of the Fort Collins City Council, all in hopes that they might wake up someday and see the error of their ways. Besides, as William has already pointed out, some convictions are not appealable anyways, that are otherwise fully capable of being (and absolutely deserve to be) overturned nonetheless, should exonerating evidence eventually come forward regarding them – like wrongful convictions secured from the improper submittal of factually fabricated DNA evidence, for instance. So ultimately, regardless of appeals, hearsay, elements, designated and postedness, etc. – literally anything traditionally hashed out in court – if the park boundaries used to convict him with are found out to be erroneous (which they have been!), and William wasn't within the actual, true and true park boundaries when he was ticketed for purportedly being in such (which he wasn't!), **his wrongful conviction deserves to be overturned. Period.****

Suffice it to say though, until the City and County governments start policing themselves, William, through this final report, has now begun the task of asking the rest of his community for help, as

well as the outside world. **William thought for sure that his local government was capable of policing itself, but apparently not.** He still plans on submitting this final report to key governmental members within the City and County, though, so as to provide one last offering of good faith. **So if you're reading this Carrie Daggett and/or Clifford Riedel, it's not too late to overturn his wrongful conviction!**

**It's never too late to exonerate the innocent...**

**Change.org Petition: <http://chnng.it/PtL7vJmHqM>**

**Website w/ Links: <http://www.thetruthaboutoccupyjefferson.com>**

**YouTube Playlist: <http://www.youtube.com/playlist?list=PLjxRs72qy9z-13c5WYYTB3LciHyRyktwo>**

Also, William and his brother can always use more financial help to process this and their many other cases with, so if you can, please consider donating to their cause here: <http://www.gofundme.com/helpfightcopfraud>. Thank you!

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## **LIST OF RIGHTS VIOLATED:**

- The right to free speech / protest / criticize the government.
- The right to not be retaliated against.
- The right to not be unreasonably seized absent probable cause.
- The right to the equal protection of the laws.
  
- The right to be self represented.
- The right to be presumed innocent until proven guilty.
- The right to be found guilty but only beyond a reasonable doubt.
- The right to a fair and impartial trial.
- The right to have unsubstantiated hearsay denied at my trial.
- The right to cross-examine evidence introduced against me.
- The right to face my accuser.
- The right to a fair and impartial appeal.
  
- The right to have my internal affairs claims be reported verbally.
- The right to have my criminal allegations be internally investigated.
- The right to have my internal affairs claims be taken seriously.
- The right to not be defamed as a "lawsuit scammer."

**LIST OF DEPARTMENTS** THAT ALL 100% CONSISTENTLY MAINTAIN THAT WHAT WILLIAM AND DAVID STOOD WITHIN THAT MORNING OF SEPTEMBER 15, 2015, WAS THE PUBLICLY OWNED AND MAINTAINED 100-FOOT RIGHT-OF-WAY SIDEWALK OF LINDEN STREET:

- **Fort Collins Municipal Court (Judge Kathleen Lane)**
  - To Include A Not Guilty Finding Of David For Standing In The Same Sidewalk
- **Fort Collins Survey Department**
  - To Include The City's 146 Year Old Town Plat & A Survey Pin Found Onsite
- **Fort Collins Real Estate Department**
  - To Include A Lease, Quitclaim Deed, & Letter To City Manager (Each w/ Maps)
- **Fort Collins Right Of Way Department**
- **Fort Collins Streets Department**
- **Fort Collins GIS Department**
- **Fort Collins Parks Department**
- **Fort Collins Zoning Department**
  - To Include A Construction Permit To Place Sidewalk Closed Signs On It
- **Fort Collins Engineering Department**
  - To Include Railroad Construction & Proposed Parking Lot Blueprints
- **Other Fort Collins Police Department Officers**
  - To Include Ones Who Didn't Ticket People Found In The Same Sidewalk
- **Larimer County Mapping & Parcel/Property Records**

**LIST OF GOVERNMENT OFFICIALS** THAT ARE EITHER DIRECTLY OR INDIRECTLY, ACTIVELY OR PASSIVELY, RESPONSIBLE FOR WRONGFULLY CONVICTING WILLIAM:

- **Sergeant Sean Giddings**
- **Officer Bryan Grosshans**
  - Officer Matthew Brede
  - Officer Matthew Brough
  - Officer Rick Mainwal
- **Officer Josh Golden**
- **Lieutenant Jarred Kinsman**
- **Lieutenant Craig Horton**

- **Lieutenant Daniel Murphy**
- **Sergeant Jackie Pierson**
- **Sergeant Heather Moore**
- Former Chief Of Police Terry Jones
- Former Chief Of Police John Hutto
- **Former Assistant Chief Of Police Kevin Cronin**
- Former Assistant Chief Of Police Jerry Shiager
- City Manager Daniel Atteberry
- **City Attorney Carrie Daggett**
- City Prosecutor Robert Fink
- Councilmember Bob Overbeck (District 1)
- Councilmember Ray Martinez (District 2)
- Councilmember Ken Summers (District 3)
- Councilmember Kristin Stephens (District 4)
- Councilmember Ross Cunniff (District 5)
- Councilmember Gerry Horak (District 6 / Mayor Pro Tem)
- City Mayor Wade Troxell
- **Larimer County District Attorney Michael Deschenes**
- **Larimer County District Attorney Laurie Dean**
- **Larimer County District Attorney David Vandenberg**
- **Larimer County District Attorney William Starks**
- **Larimer County District Attorney Clifford Reidel**
- Larimer County District Attorney Daniel McDonald
- Larimer County District Attorney Scott Rogers
- Larimer County District Attorney Jason Aubin
- Larimer County District Attorney Stanley Hernandez
- Larimer County District Attorney Christine Bradshaw
- Larimer County District Attorney Amy Wimmer
- Larimer County District Attorney Kelsey Knibbe
- Larimer County District Attorney Charles Robles
- Larimer County District Attorney Sean Curtis
- Larimer County District Attorney Timothy Perkins
- **Larimer County Judge Kraig Ecton**
- District Court Judge Stephen Howard

## **LIST OF CRIMINAL ACTS COMMITTED:**

- **RACKETEERING ACTIVITIES**
- CRIMINAL CONSPIRACY
- ACCESSORY TO A CRIME
- HUMAN TRAFFICKING
- SECOND DEGREE KIDNAPPING
- **FIRST AND SECOND DEGREE PERJURY**
- FALSE IMPRISONMENT
- OFFERING A FALSE INSTRUMENT FOR RECORDING
- OBSTRUCTION OF PUBLIC JUSTICE
- FALSE REPORTING TO AUTHORITIES
- ATTEMPT TO INFLUENCE A PUBLIC SERVANT
- OFFICIAL OPPRESSION
- FIRST DEGREE OFFICIAL MISCONDUCT
- ISSUING A FALSE CERTIFICATE
- DUTY TO REPORT A CRIME
- SEGREGATION
- **RETALIATION**
- **DISCRIMINATION**
- **DEFAMATION**
- **HATE CRIMES**
- THEFT OF FEDERAL LAND
- SUCCESSION FROM THE NATION
- VIOLATION OF SEPARATION OF CHURCH AND STATE
- DOMESTIC TERRORISM
- STATISTICS FRAUD
- CRIMES AGAINST HUMANITY
- TREASON



# LIST OF ORGANIZATIONS AND PEOPLE THAT THIS REPORT IS BEING SENT TO:

## THE LARIMER COUNTY DISTRICT ATTORNEY

*8thdist-da@co.larimer.co.us*

## EVERY SINGLE PERSON THAT WORKS FOR THE CITY OF FORT COLLINS THAT HAS A PUBLIC EMAIL ADDRESS

*(this includes the city mayor, city manager, and city attorney, all city council members, the chief of police, the entire police internal affairs department, every single police officer, and literally every other city employee who works in every other city department, etc.)*

*(the actual list is **literally 1700 email addresses** long – waaaaay too long to be reproduced here!)*

## NEWS AGENCIES:

### **The Fort Collins Coloradoan**

*jenniferhefty@coloradoan.com  
shindi@coloradoan.com  
jenbrown@coloradoan.com  
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sarahkyle@coloradoan.com  
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ericlarsen@coloradoan.com  
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kevinduggan@coloradoan.com  
patferrier@coloradoan.com  
jlaxen@coloradoan.com  
kevinlytle@coloradoan.com  
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erinudell@coloradoan.com  
cabshire@coloradoan.com  
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sswanson@coloradoan.com*

### **The Rocky Mountain Collegian**

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**The Denver Post**

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cosher@denverpost.com  
nphillips@denverpost.com  
icolacioppo@denverpost.com  
dcoffield@denverpost.com*

**The Gazette**

*citydesk@gazette.com*

**The Greeley Tribune**

*citydesk@greeleytribune.com*

**Grand Junction Daily Sentinel**

*tips@gjsentinel.com*

**The Denver Channel 7 News**

*contact7@thedenverchannel.com*

**KDVR Fox 31 News**

*tips@kdvr.com*

**CBS 4 News**

*cncnews@cbs.com*

**Pueblo Chieftain**

*825 W 6th St, Pueblo, CO 81003*

**Boulder Daily Camera**

*2500 55th St #210, Boulder, CO 80301*

**Lakewood Sentinel**

*750 W Hampden Ave Suite 225, Englewood, CO 80110*

**KKTV News**

*520 E Colorado, Colorado Springs, CO 80903*

**HOMELESS & OTHER ADVOCATE AGENCIES****Fort Collins Rescue Mission**

*316 Jefferson St, Fort Collins, CO 80524*

**Catholic Charities Of Fort Collins**

*460 Linden Center Dr, Fort Collins, CO 80524*

**Catholic Charities Of Denver**

*6240 Smith Rd, Denver, CO 80216*

**Colorado Coalition For The Homeless**

*info@coloradocoalition.org*

**Denver Homeless Out Loud**

*info@denverhomelessoutloud.org*

**Coalition on Human Needs**

*info@chn.org*

**National Coalition For The Homeless**

*info@nationalhomeless.org*

**National Alliance To End Homelessness**

*naeh@naeh.org*

**National Coalition For Homeless Veterans**

*nchv2@nchv.org*

**National Law Center On Homelessness And Poverty**

*mfoscarinis@nlchp.org*

**National Low Income Housing Coalition**

*info@nlihc.org*

**National Policy And Advocacy Council On Homelessness**

*info@npach.org*

**The Coalition For The Homeless**

*mferrell@dccfh.org*

**Colorado Homeless Bill Of Rights**

*wrap@wraphome.org*

**Fort Collins Community Action Network**

*info@fccan.org*

*fccanintern@gmail.com*

**Fort Collins Not In Our Town Alliance**

*llwashing@gmail.com*

*cherylbeckett@q.com*

*cimiller44@hotmail.com*

*preble@frii.com*

**WHISTLEBLOWER ORGANIZATIONS**

**National Whistleblower Center**

*contact@whistleblowers.org*

**Government Accountability Project**

*info@whistleblower.org*

**Project On Government Oversight**

*info@pogo.org*

**Anti-Defamation League**

*adlmedia@adl.org*

**The Innocence Project**

*info@innocenceproject.org*

**Clear The Bench Colorado**

*info@clearthebenchcolorado.org*

**Whistleblowers Of America**

*601 Pennsylvania Ave Northwest, S Tower, Ste 900, Washington, DC 20004*

**STATE & FEDERAL CIVIL RIGHTS AGENCIES**

**The ACLU**

*intake@aclu-co.org*

**Civil Rights Education And Enforcement Center**

*arobertson@creeclaw.org*

**Colorado Bureau Of Investigation**

*cdps\_cbi\_denver@state.co.us*

**U.S. DOE Office Of Civil Rights (Denver)**

*ocr.denver@ed.gov*

**U.S. Commission On Civil Rights**

*referrals@usccr.gov*

**Department Of Regulatory Agencies**

*ccrd@dora.state.co.us*

**U.S. DOJ (Office of Community Oriented Policing Services)**

*nazmia.alqadi@usdoj.gov*

**U.S. DHHS Office Of Civil Rights (Colorado Division)**

*ocrcomplaint@hss.gov*

**Colorado State Patrol, District 1**

*steve.garcia@state.co.us*

**Colorado State Patrol, District 3**

*tim.keeton@state.co.us*

**Colorado Department Of Human Services**

*cdhs\_communications@state.co.us*

**Colorado Bureau Of Investigation**

*cdps\_cbi\_denver@state.co.us*

**F.B.I. (Denver Field Office)**

*8000 E 36th Ave, Denver, CO 80238*

*tips.fbi.gov*

**Department Of Homeland Security**

*mediainquiry@dhs.gov*

**Associated Students Of CSU**

*ascsu\_front\_desk@mail.colostate.edu*

**Fraternal Order Of The Police**

*701 Marriott Dr, Nashville, TN 37214*

**National Sheriff's Association**

*1450 Duke St, Alexandria, VA 22314*

**Colorado Department Of Labor And Employment**  
633 17th St #201, Denver, CO 80202

**Colorado Department Of Local Affairs**  
1313 Sherman St #518, Denver, CO 80203

**US Department Of Housing And Urban Development**  
1670 Broadway 25th Floor, Denver, CO 80202

**U.S. Department Of Justice (Civil Rights Division)**  
950 Pennsylvania Ave NW, Washington, DC 20530

**National Security Agency**  
9800 Savage Rd, Ste 6272, Ft George G Meade, MD 20755

## **COLORADO STATE GOVERNOR**

**Governor Jared Polis**  
136 State Capitol Building  
Denver, CO 80203

## **MOST HOUSE AND SENATE LEADERS**

*john.buckner.house@state.co.us*  
*rhonda.fields.house@state.co.us*  
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*jack.tate.senate@state.co.us*  
*senbobgardner@comcast.net*  
*nancy.todd.senate@state.co.us*

## **OTHER CITY GOVERNMENTS**

*ccouncil@cityofloveland.org*  
*council@bouldercolorado.gov*  
*council@broomfieldcitycouncil.org*  
*dencc@denvergov.org*  
*citycouncil@auroragov.org*

## **FACEBOOK GROUPS**

Citizens Crime Watch  
Westminster And Arvada Neighborhood Watch  
Homeless Outreach/Voice/Forum/Support: Global Forum & Support  
Cop Watch Colorado  
Justice For The Wrongfully Convicted  
Wrongful Conviction Awareness (WCA)  
Global Child / Human Trafficking Will End (Spread Awareness) Worldwide  
Police Shootings, Brutality, Corruption, Misconduct & Government Corruption  
Police Corruption And Wrongdoing  
Wrongfully Convicted  
Wrongly Convicted Group  
FTP = Film The Police... Everywhere.. Make Them Accountable  
U.S. Government Crimes Exposed  
Wrongful Conviction Discussion  
Wrongfully Convicted USA  
Police Brutality Corruption In America  
Citizens Guard  
The Guilty In Innocence Project  
HA4ALL - Homeless Advocacy For All  
Fort Collins Neighborhood Watch  
Human Trafficking Awareness Heroes  
Holding Police Accountable  
Free Thinkers United... End The Corruption  
Whistleblowers!  
Taskforce Denver Homeless  
Colorado Homeless  
Colorado Homeless - Boulder  
Fort Collins Neighborhood Watch

The Worlds Wrongfully Convicted  
Homeless In America  
Wrongfully Convicted  
Whistleblowers  
Injustice Anywhere - Wrongful Convictions  
Record The Police  
Wrongful Conviction Shout Out To President Trump  
Actual Innocence  
Police Behavior~Vs~The Constitution And Freedom  
National Coalition For The Homeless  
Police Accountability  
Homeless Army

## **RELIGIONS**

### **The Catholic Pope**

*av@pccs.va*

### **LDS Office Of The First Presidency**

*47 East South Temple Street, Salt Lake City, Utah 84150*

### **The Jewish Federations Of North America**

*25 Broadway, 17th Floor, New York, NY 10004*

### **Muslim American Society**

*1206 Apollo Road, #851255, Richardson, TX 75085*