

County/District Court
City and County of Denver, Colorado

THE PEOPLE OF THE STATE OF COLORADO

Offense Case No. 2019-5002576



**AFFIDAVIT AND APPLICATION FOR ARREST WARRANT
AND THE ARREST WARRANT FOR THE PERSON(S) OF:**

Aaron Caleb Elinoff; Dob:08/22/1984, White, Male, 5'-10", 155lbs, Brown Eyes, Brown Hair, with a last known address of 1316 Tennyson Street, Denver Colorado 80204 For:

CRS 18-8-306 Attempt to Influence a Public Servant, a Class Four Felony

I, Detective Joseph A. Delmonico #90-34, the Affiant, state under oath that the facts known to the Affiant which establish probable cause to believe that a criminal offense was committed, and that the offense was committed by the above named person(s), are the following:

On June 25, 2019 your affiant, who is assigned to the Denver Police Vice / Narcotics, Excise and License Unit, was assigned the follow up investigation for the Short Term Rental applicant Aaron Elinoff; Dob: 08/22/84. Your affiant respectfully requests that for the entirety of this affidavit Short Term Rental will be referred to as "STR", therefore the investigation revealed the following:

On March 27, 2019, Aaron Elinoff submitted an application for a STR license to Denver Excise and License. The application was for a residence at 641 N Raleigh Street, Denver Colorado, 80204 that was and is now located in the City and County of Denver. As part of the STR application Mr. Elinoff is required to submit documents and a Colorado Driver's License to assist with proof of residence. The Colorado Driver's License Mr. Elinoff submitted had a listed address of 3136 Larimer Street.

Denver Excise and Licensing Technician Alex Cobell was assigned to follow up on this application due to the discrepancy of the two different addresses on the Elinoff application. Technician Cobell found that that Elinoff purchased the residence at 641 Raleigh Street in 2014 with [REDACTED]. Technician Cobell then found a Denver 311 complaint, which is a service for citizens to lodge complaints or make requests for City Services that are non-police related. The call was from [REDACTED] about compost service at 641 Raleigh Street in August 2017. In October of 2018 [REDACTED] purchased 1316 N Tennyson Street with [REDACTED]. Then in January of 2019, Aaron Elinoff called 311 for compost pickup at 1316 N Tennyson Street. In-addition Aaron and [REDACTED] are registered to vote at 1316 N Tennyson Street.

On May 14, 2019 Denver Excise and License sent, via an email, Aaron Elinoff an Affidavit of Primary Residence, that was completed and on May 23, 2019 and notarized by Notary Public Jessica Villalobos-Vargas. This form clearly states that making a false statement, that an individual does not believe to be true in the affidavit, is punishable under the criminal laws of the State of Colorado as perjury in the Second Degree Under Colorado Revised Statute 18-8-503.

On June 5, 2019 Denver Excise and License Inspector Brooke Bearman responded to 1316 Tennyson Street to attempt to verify the primary residence of Aaron Elinoff. At this location Inspector Bearman observed an individual working on a garden project and carrying a shovel. Inspector Bearman parked her car and approached the individual and took a photo of this individual with her phone. Bearman asked

AFFIDAVIT AND APPLICATION FOR ARREST WARRANT

if he was Aaron and do you live at this location, and the individual stated, yes. Inspector Bearman asked the individual if she could ask a few questions and the individual was on the phone and stated, No. Then inspector drove a block away to complete her notes. Inspector Bearman then drove to 641 Raleigh Street and observed the same individual entering this residence.

On June 10, 2019 Licensing Compliance Coordinator Brian Snow spoke with Aaron Elinoff on the phone and Mr. Elinoff stated he told Inspector Bearman the he did not live on Tennyson Street and the neighbors on Raleigh Street would know he lives at 641 Raleigh Street.

On June 11, 2019 Inspector Bearman responded to the area of 641 Raleigh Street to contact the neighbors. Inspector Bearman contacted [REDACTED] that lives at [REDACTED] Raleigh Street and she stated that she has not seen anyone there at the house for over a month. She stated she has not seen Elinoff and she spends a lot of time [REDACTED] 641 Raleigh Street.

Inspector Bearman contacted [REDACTED] at [REDACTED] Raleigh Street and stated she did think anyone lives at the house and she has seen people at the house every couple of weeks that are there briefly. Ms. [REDACTED] further stated that a young couple, a lawyer and an artisan lived at 641 Raleigh Street and she saw a moving van there in early 2019 and since then the house has been empty.

Inspector Bearman went to [REDACTED] Raleigh Street directly across from 641 Raleigh Street and she contacted [REDACTED] and he stated that he sees lots of different people that arrive with bags and their cars have out of state plates. Mr. [REDACTED] recognized a photo Inspector Bearman had of Aaron Elinoff and stated that he recognized the picture as the individual that goes in and out and randomly appears. According to [REDACTED] the individual in the picture does not spend the night.

Inspector Bearman responded to [REDACTED] Raleigh Street and contacted [REDACTED] and she stated she used to see the owners come and go, but now she never sees them. Inspector Bearman showed the photo of Elinoff to Ms. [REDACTED], but she did not recognize the photograph. Ms. [REDACTED] added that she sees people come and go with bags.

On June 20, 2019 Licensing Compliance Coordinator Brian Snow responded to the area of 1316 Tennyson Street and knocked on the door at [REDACTED] Tennyson Street and the resident stated that a young man and a woman lived at 1316 Tennyson Street, but he did not have any other information. Snow went to [REDACTED] Tennyson Street and spoke with [REDACTED] who stated he knows Aaron and [REDACTED] and Aaron lived at 1316 Tennyson Street. He stated that both Aaron and [REDACTED] had given him [REDACTED] and Mr. [REDACTED] stated he [REDACTED]. Adding that he observed Aaron working in the yard installing flower boxes.

On June 25, 2019 at approximately 1039Hrs Your Affiant along with Detective Tom Sanchez #90-02 and Sergeant Mike Mosco #88-27 responded to the area of 641 Raleigh Street. Your Affiant knocked on the door at 641 Raleigh Street and there was no answer and from the front window the house appeared to be very clean and furnished. Your Affiant contacted [REDACTED] at [REDACTED] Raleigh Street and he was asked about the house across the street (641 Raleigh Street) and he stated that he thinks it is an "B&B" and he works nights and it looks like there are travelers that are coming and going. Mr. [REDACTED] stated that the owners drive a White Range Rover and a Black Fiat. Mr. [REDACTED] stated that he does not have any problems with the people coming and going. Mr. [REDACTED] was shown a Colorado Driver's License

AFFIDAVIT AND APPLICATION FOR ARREST WARRANT

Photo of Aaron Elinoff but could not identify him from the photo. Mr. [REDACTED] stated that he was aware that his son spoke to the inspector previously.

Your Affiant responded to [REDACTED] Raleigh Street the house [REDACTED] of 641 Raleigh Street and contacted an [REDACTED] and her [REDACTED] who stated his mother's name was [REDACTED]. They did not have a lot of information about the people that live at 641 Raleigh Street. Although, according to Inspector Bearman this is where the woman lives that cleans the house for Elinoff.

Your Affiant went to [REDACTED] Raleigh Street and contacted [REDACTED] and she stated that the owners are in and out and they had a dog that barked all the time.

Your Affiant responded to [REDACTED] Raleigh Street and contacted [REDACTED] that lived at 641 Raleigh Street and named her as [REDACTED] who lived there for 3-4 years and they had fourth of July parties. Ms. [REDACTED] stated that she may be able to identify [REDACTED] but not [REDACTED]. Ms. [REDACTED] stated that the past spring she noticed a moving van at the house.

Your Affiant responded to [REDACTED] Raleigh Street and contacted [REDACTED] and she stated she did not know the people at 641 Raleigh Street, but if the detective went to [REDACTED] Raleigh Street she may have more information. Your Affiant went to [REDACTED] Raleigh Street, the [REDACTED] residence, based on the name above the mail box, but there was no answer.

On June 25, 2019 Your Affiant responded to the area of 1316 Tennyson Street and there appeared to be no one around the residence and no action was taken at this time. Later this day your affiant knocked on the door at 1316 Tennyson and there was no answer. There was a dog barking and it appeared there was someone working on newly built flower boxes in the front yard. Your Affiant knocked on the door at 1324 Tennyson Street during this same day and there was no answer.

On June 26, 2019 Your Affiant responded back to the area of 1316 Tennyson Street and contacted [REDACTED] at [REDACTED] Tennyson Street. Mr. [REDACTED] was asked if he knew the people that live at 1316 Raleigh Street and he stated that a young [REDACTED] named [REDACTED] and Aaron live there and they have lived there for less than a year. Your Affiant obtained a photo of Aaron Caleb Elinoff, Dob: 08/22/1984 from Colorado Department of Motor Vehicle and asked Mr. [REDACTED] if he would recognize Aaron if he saw a picture of him. Mr. [REDACTED] stated he might, and he was shown the single driver's photo and he did not recognize the photo. Then Your Affiant showed the photo that was taken by Inspector Bearman and Mr. [REDACTED] stated that looked more like Aaron. The following photos #1 & #2 were shown to Mr. [REDACTED] and #3 was obtained from a Google Search of Aaron Elinoff Attorney.

AFFIDAVIT AND APPLICATION FOR ARREST WARRANT

REDACTED

On June 28, 2019 your affiant conducted a computer check on Aaron Elinoff and he has registered vehicles at 641 Raleigh Street, no vehicles registered at 1316 Tennyson Street.

Based on these facts your affiant has probable cause to believe that Aaron Caleb Elinoff; Dob: 08/22/2019 committed the crime of Attempt to Influence a Public Servant, CRS 18-8-306, a Class Four Felony, and your affiant respectfully requests an arrest warrant be issued so this investigation can be completed.

I affirm this information to be true and correct

[Signature]
Signature of Affiant

Subscribed under oath before me on

06/28/2019 Date 11:20 AM Time

[Signature]
Judge or Notary Public

My commission expires:

MICHAEL T MOSCO
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20084040096
MY COMMISSION EXPIRES DECEMBER 9, 2021

ARREST WARRANT

To all Sheriffs, Peace Officers and Police Officers with the said State:

You are hereby commanded to take the person of the defendant and bring him without unnecessary delay before a Judge of the County Court to be dealt with according to law.

Bail fixed at \$ At first appearance

[Signature]
Signature of Judge

Date June 28, 2019

Beth A. Faragher
Printed name of Judge

I HEREBY CERTIFY that I executed the above warrant on (date) 07-2-19 by taking Aaron Elinoff

