



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



William Vincent Vernon (12/02/1991), who is a Black Male, 5'07" tall, 155 pounds, Black Hair and Brown Eyes, SID # [REDACTED] for the following charge(s):

**- Aggravated Cruelty to Animals, C.R.S. 18-9-202(1.5)(b), Class 6 Felony**

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I, Detective Cory Hegwer (05047), 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 April 3, 2020 at approximately 0906 hours, Officer Raymond Allen #05136, responded to 10700 East Dartmouth Avenue, [REDACTED], which is in the City and County of Denver, on a welfare check as there was a foul odor coming from the unit. Upon arrival, Officer Allen contacted the complainant, [REDACTED], who is the manager for the apartment complex. For over a week this odor had been getting stronger and stronger to the point that they could tell it was coming from this unit. The manager stated that they had attempted to contact the tenant, William Vernon (12/02/1991) but were unsuccessful. Once on scene, Officer Allen stated the smell was so bad, he believed that it was possible that someone had died inside the apartment. Officer Allen knocked on the door but there was no answer. At that time, it was decided that maintenance could open the door, so they could check on the welfare of anyone inside the apartment. Maintenance staff drilled out the lock and entry into the unit was made. Officer Allen noted the following in his statement in regard to the entry and what was located:

*"Upon entry, the inside of the apartment was trashed with numerous health violations. Rotting food and items were on the floor and it appeared the apartment had not been cleaned in weeks, probably months. During the search I observed a cage in the corner of the apartment, which was in the living room. Inside the cage, I observed a black and white dog, not moving, but standing up. I had to get closer because the dog appeared deceased. I noticed the dog was not deceased, but unable to sit down, due to all the feces inside the cage, and the cage being too small. The dog also appeared to be malnourished and distressed. The dog did not react to my presence, but was standing, hunched over, and shaking. No person was found inside the apartment, but animal control was called. Animal control responded and went inside the apartment. Animal control officer Jenna Humphreys advised that there were 5 padlocks on the cage and taking the dog out of the location would prove difficult, if not impossible. Humphreys, along with her partner Michael Carlson, decided to take the whole cage out of the apartment, and transport the dog to the Denver Animal Shelter."*

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Animal Control Officer Humphreys noted the following in her statement:

***"This report is for A350585, an approximately 3yr old intact male white/fawn Pit Bull. The dog was removed from a kennel taken from 10700 E. Dartmouth Ave. ██████████ Denver, CO 80014, on April 3<sup>rd</sup>, 2020 for an animal cruelty investigation. This dog is currently being housed at the Denver Animal Shelter, located at 1241 W. Bayaud Ave. Denver, CO 80223 in the veterinary clinic in kennel V103.***

***I, Denver Animal Protection Officer Jenna Humphreys #301 have 6 years and 8 months of experience as a Denver Animal Protection Officer. I am certified in the state of Colorado through the Colorado Association of Animal Control Officers (CAACO). I am also trained and experienced with Body Condition Scoring animals, to determine if the animal is of a healthy or unhealthy weight. I use the Purina Body Condition Scale which is a 1 out of 9 scale with a 1-2 being emaciated, a 4-5 being ideal weight, and a 8-9 being overweight to the point of unhealthy. The scale uses visual observations along with physical handling of the dog to determine the score of the dog. I scored A350585, a 1.5/9, given that I could feel the dog's ribs, lumbar vertebrae, pelvic bones. The dog had very little to no discernible fat. The dog had obvious muscle loss as well and had difficulty walking. At several points fell down while being examined by veterinary staff.***

***Given the amount of feces and the several empty bowls inside the kennel, it appears that the dog may have been kept in the kennel for 2-3 weeks without food or water. The dog had a small opening in the kennel to stick his head out of that it appeared he was eating trash from around the kennel. We also noted debris of cardboard inside the crate. The benefit of a blood draw in this situation is to rule out underlying metabolic or endocrine diseases such as diabetes, liver and kidney disease, as a case for emaciation. Based on the age of this animal approximately 3 years, these diseases tend to be less likely. The blood draw may show low protein which would support the conclusion that the dog may have been starved. "***

On this date (04/03/2020) Detective Hegwer was assigned as the "Book Detective" and received a phone call from Office Allen who advised Detective Hegwer of what had occurred at 10700 East Dartmouth Avenue, unit M-101. Detective Hegwer advised him to complete a report.

Later, Detective Hegwer received a phone call from Deputy District Attorney Ashley Beck who requested that search warrant be issued for the dog that was seized in order for his blood to be drawn and tested which can assist in the investigation and show what extent the dog had been malnourished. Detective Hegwer completed the search warrant which was then sent to the judge to be signed. Judge Zobel reviewed the warrant and signed it.

Detective Hegwer then sent the signed warrant to Animal Control Officer Humphreys for the blood draw.

Officer Humphreys advised Detective Hegwer that her and her partner would be taking a copy of the warrant and leaving it at the residence and also leaving a notice of impoundment. Later Officer Humphreys called Detective Hegwer cell phone and advised that when they went to serve the paperwork, the tenant was home. She advised that the person who answered the door matched a mug

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shot of William Vernon that they had looked at and also stated he was wearing a Safeway name tag with William on it. She stated that the tenant ran from her partner on foot who pursued him on foot while calling for police. She related the suspect got away however he had stated to her partner that the

dog was not his it belonged to a friend. Officer Humphreys related that the dog had a microchip which listed an owner's name which was not William Vernon.

On April 6, 2020, Detective Hegwer called and spoke with the original complainant, [REDACTED]. She related that she had never met Vernon and could not ID but she had his driver's license [REDACTED]. A copy of Vernon's driver license was sent to Detective Hegwer and attached to this case. She then related that one of her coworkers, [REDACTED], had additional information about the dog. [REDACTED] related that she believed that a female in building [REDACTED] was the dog's owner. The female, [REDACTED] had told her that the dog was her "emotional support" animal. It was related that sometime in the fall of 2019, Denver PD had gone into that unit ([REDACTED]) to apprehend a fugitive on an unrelated matter. [REDACTED] stated that when that happened a dog had gotten out and the office was advised of the dog. At that time no owner for the dog could be located. [REDACTED] stated that she ended up taking this dog home for a few days until this female, [REDACTED] came into to claim the dog. The dog was then returned to her. [REDACTED] stated that she believed that [REDACTED] and William Vernon had been "hanging out" and that is why the dog was in Vernon's apartment.

On April 8, 2020, Your Affiant received a phone call from [REDACTED] who related that he was the actual owner of the dog. He stated that he had lost the dog a while back ago and that he had put up fliers to try to locate him. He stated that he had hoped to get notified of the dog's recovery as he as a microchip. [REDACTED] stated that he had not heard anything about the dog since until the microchip company called him and advised him of the dog's location. [REDACTED] also related that he did not know anyone named William Vernon.

On April 9, 2020, Your Affiant received an email which contained a typed statement from the veterinarian, [REDACTED] who evaluated the dog she related the following:

*"08 April 2020 A350585 On 03 April 2020, the veterinary staff was asked by animal police officers J. Humphries and M. Carlson to examine animal identification number A350585, an intact 3-year old male American Pit Bull Terrier named "[REDACTED]" in the intake garage. The patient was locked in a pet carrier filled with considerable feces and urine, with an empty food and water bowl. He was caked with malodorous feces and urine and before examination, he was bathed to remove most of the excrement from his fur.*

*After bathing, [REDACTED] was brought to the veterinary clinic for an initial physical exam. He was quiet, but alert and responsive. [REDACTED] was emaciated; his body condition score (rated on a scale of 1 to 5, 1 being very thin and 5 obese) was 1/5. He weighed 41.2 pounds and his ideal weight is estimated to be at least 55-60 pounds. His ribs, spine and hips were clearly prominent with severe muscle wasting. He had multiple skin*

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*ulcerations/decubitus ulcers throughout his body, most likely due to the lack of normal subcutaneous fat at bony contact surfaces and forced prolonged recumbency in a*

*small kennel over a long period of time. His skin was erythematous (red and inflamed) with areas of superficial ulceration and mild purulent (infected) discharge secondary to the chronic fecal and urine scald on his skin. His specific skin lesions (number/size/location) are documented in the medical record.*

██████████ *was ambulatory but was weak and ataxic (unsteady) especially in his hind end, with a mild grade 1 lameness in his right pelvic limb. He had moderate to severe swelling in both pelvic limbs, most prominent distally to both stifles and with pitting edema (accumulation of abnormal fluid in the tissues), most likely due to restricted circulation from prolonged recumbency in a small confined space over an extended period of time.*

*His scrotal sac was moderately swollen, erythematous and irritated and it was difficult to palpate if two testicles were present. His mucous membranes (gums) were pale and moderate dental tartar was evident on his oral exam. He was able to urinate normally but had voluminous diarrhea, without frank or digested blood, or mucus.*

██████████ *was started on oral antibiotics for his infected skin wounds as well as an analgesic (pain medication) and a bland gastrointestinal food. He was placed on a very strict refeeding schedule to avoid the physiological derangements of refeeding syndrome (when emaciated patients are given too much food after starvation and the body is unable to compensate for the additional calories). He was offered a small amount of water which he drank readily and later ate the small amount of food that was offered. Later in the day, we noted that ██████████ was licking his ulcerated and erythematous skin on his ventrum, paws and scrotum and placed an Elizabethan collar to prevent access and exacerbation of his skin condition.*

*After Officer J. Humphries informed veterinary staff that a warrant had been issued for bloodwork, blood was submitted to the lab. After blood was taken, a free catch urine sample was obtained, and a urinalysis was performed in-house. The urinalysis was unremarkable and ruled out a urinary tract infection and renal (kidney) insufficiency. Results from the bloodwork were received the following day.*

*Abnormal values are described in the medical record but briefly, abnormal findings included low protein, mildly elevated AST, ALT and ALKP values, low creatinine and CPK (muscle enzymes), low calcium, anemia (low red blood cells), and bands (due to skin condition/infection). Abnormal values were consistent with lack of nutritional intake/starvation and consequent emaciation as well as muscle/tissue trauma, secondary to prolonged recumbency and infected decubital ulcers, all consistent with the history and presentation of the patient at intake.*

*Severe emaciation can be due to either lack of food intake (starvation) or weight loss secondary to an underlying systemic/metabolic disease process and/or anorexia.*

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██████████ has had an excellent appetite since arrival and has been responding well to his refeeding schedule without exhibiting symptoms of refeeding syndrome. The bloodwork ruled out many underlying systemic diseases that can result in weight loss. Elevated values for AST, ALT and ALKP were mild and consistent with muscle trauma; there are no apparent signs of hepatic failure (icterus (jaundice), lethargy, anorexia) or endocrine disease (polyuria/polydipsia, pot-belly, bilateral alopecia (hair loss)). There are a number of differentials for regenerative anemia in addition to nutritional deficiencies; however, no other symptoms associated with the common causes are apparent (melena (blood in stool), endoparasites (ruled out from fecal), blood parasites (ruled out by bloodwork), icterus/hemolytic anemia (ruled out clinically), other infectious (ruled out by bloodwork)).

██████████ prognosis is still uncertain at this time. We will continue to provide supportive care and medication and monitor his clinical response, but due to his severe clinical state, it is too preliminary to know if he will make a full recovery or whether he will have permanent physical deficits long-term.

██████████, DVM

Associate Veterinarian  
Denver Animal Protection"

On April 17, 2020, Your Affiant, created a six (6) photograph sequential lineup which included a photo of William Vernon (12/02/1991) in photo number 5. Officer Carlson responded to the District Three Station to view the photo lineup. Detective Hegwer gave the Photographic Admonition Form to Officer Carlson to read and he stated that he understood the directions. Detective Hegwer then stepped out of the room and Detective Stewart showed the photos. A few minutes later Detective Stewart advised Detective Hegwer that Officer Carlson had selected photo number 5. Officer Carlson noted on the admonition that he was confident that the person in photo number 5 is the same person he met at 10700 East Dartmouth Avenue, apartment ██████████ when he was attempting to post the notice of impoundment. Officer Carlson noted that this person claimed responsibility for the dog and then ran away from him. Officer Carlson positively identified William Vernon (12/02/1991) as the suspect.

Detective Hegwer presented this case to Denver District Attorney's Office and Deputy District Attorney Ashley Beck reviewed the case and has tentatively accepted this case for the charge of Aggravated Animal Cruelty.

Based on the above information, Your Affiant respectfully request that this Probable Cause Warrant be issued for William Vincent Vernon (12/02/1991), who is a Black Male, 5'07" tall, 155 pounds, Black Hair and Brown Eyes, SID ██████████ for the charge of Aggravated Cruelty to Animals, C.R.S. 18-9-202(1.5)(b), Class 6 Felony.

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I affirm this information to be true and correct

[Signature] 05047  
Signature of Affiant

Subscribed under oath before me on

4/17/20 1220  
Date Time

GEORGE KENNY  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20054025279  
MY COMMISSION EXPIRES JULY 23, 2021

[Signature] 97036  
Judge or Notary Public

My commission expires:

07/23/21

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 \$ \$5000 PR Bond

[Signature]  
Signature of Judge

Date April 17, 2020

James Zobel  
Printed name of Judge

I HEREBY CERTIFY that I executed the above warrant on (date) \_\_\_\_\_ by taking \_\_\_\_\_  
\_\_\_\_\_ (name of person arrested) into custody and placing said person in the \_\_\_\_\_ Jail for safekeeping until  
further order of the court.

\_\_\_\_\_  
Signature of Arresting Officer