

County Court, City and County of Denver, Colorado
Lindsey-Flanigan Courthouse, Room 160
520 W. Colfax Ave.
Denver, CO 80204

Plaintiff: The People of the State of Colorado

Defendant: **MICHAEL ROY HILL**
01/28/1982

▲ COURT USE ONLY ▲

Case Number:

Div: Criminal Ctrm

SUPPORTING AFFIDAVIT FOR AT LARGE ARREST WARRANT

I, PETER VORIS of lawful age do swear upon my oath to the facts set forth below and on 13 continuation page(s):

Your Affiant, Peter Voris, has been a sworn peace officer for 20 years. Your Affiant has law enforcement experience in Patrol, Investigations, and as a Police Sergeant with The City of Lafayette, Boulder County Colorado, and as a Criminal Investigator for the 2nd Judicial District of Colorado Elder at-Risk Unit. Your Affiant was assigned to investigate allegations of CRIMINAL NEGLIGENCE RESULTING IN SERIOUS BODILY INJURY TO AT-RISK PERSON, in violation of 18-6.5-103(2)(b); by **MICHAEL ROY HILL** against [REDACTED], from October 2019 to December 12, 2019, on DA Case Number **2020ECU00042**.

On December 12, 2019, Denver Police Department received a Colorado Adult Protective Services Report, concerning allegations involving a young man with developmental disabilities and his Host Home Provider, Michael Hill. A Denver Police GO Report of 19-5004952 was generated, and the investigation was assigned to Detective Michael Gillit. The narrative of the report from Adult Protective Services read as follows:

"RP (Reporting Party) is from [REDACTED] (residential provider). Client is IDD (Intellectually and Developmentally Disabled) living in a host home where his needs are not being met. Client is not attending day program due to HH provider refusing to transport; as a result, client's routine and daily structure are unknown. Client is not being given medications - this is known because medications are delivered to [REDACTED]. At this time client's medications are not even being refilled as he is missing doctor's appointments. HH provider does not answer the phone and is not allowing [REDACTED] in the house to complete audits or client visits. HH provider is generally not complying with rules or abiding by contract. Client last seen by RP one month ago and he appears to have lost a significant amount of weight." "Provider refuses to transport client to day program and as a result is isolated from

supports and social interaction. Client appears to have lost a significant amount of weight. Client is off his medications due to treatment non-adherence."

At approximately 1030 hours, Detective Gillit went to the listed victim's home address, [REDACTED]. Detective Gillit knocked on the front door and rang the doorbell and could hear a dog start barking from inside the home. Detective Gillit waited for a moment and heard a noise that sounded like someone was standing on the other side of the front door.

Detective Gillit knocked again and announced himself as Denver Police and could hear the dog attempt to bark but was muffled and slight movement from behind the door. Detective Gillit walked around the house and could not see any movement from the windows and returned to the front door. Detective Gillit knocked on the front door very loudly and using a loud voice stated, "Denver Police". Detective Gillit did this several times before the front door opened and Detective Gillit came in contact with a white male with a dog.

Detective Gillit introduced himself and confirmed that he was speaking with Michael Hill (01/28/1982). Detective Gillit advised Michael that he was there to conduct a welfare check on his client, [REDACTED] based on an allegation received of neglect.

Michael advised Detective Gillit that [REDACTED] was not there. Detective Gillit asked Michael where [REDACTED] was and Michael then stated, "He's asleep". Detective Gillit advised Michael that he would need to see [REDACTED] to make sure he was ok and being well taken care of, and Michael invited Detective Gillit into the home.

While standing in the entryway Detective Gillit observed a strong smell of Urine and feces coming from inside the home and saw clutter in the living room located on the ground level. Detective Gillit observed soiled "Puppy Pads" on the floor with what appeared to be dog feces on the carpet.

Detective Gillit then observed that there was a large pile of clothes at the top of the stairs directly in front of the front door.

Michael started walking up the stairs stating that [REDACTED] had just finished breakfast. Detective Gillit followed observing that there were blankets on the handrail with pairs of shoes on the side of the stairs. At the top of the stairs Detective Gillit observed the piles of clothes in front of a washer and drier. The pile of clothing was partially blocking the hallway but there was an access path around them. Detective Gillit waked around the corner of the hallway and then noticed there was a very strong smell of feces and urine.

Detective Gillit followed Michael to the end of the hallway where there was a closed door. Detective Gillit observed that the hallway was filled with a mattress, lamp, shelving, and other clutter to include dirty clothing. Michael knocked on the door and then opened it. Inside the door

at the end of the hallway was a naked male later identified as [REDACTED] who was covered in feces about his arms, legs, and back.

[REDACTED] was standing partially on a soiled mattress and the floor with a thick white foam around his mouth and drool hanging from his facial hair. Detective Gillit observed that [REDACTED] appeared to be severely malnourished as his bones were clearly visible around his hips. [REDACTED] started moaning, and was shaking and Michael told [REDACTED] [REDACTED] and started leading [REDACTED] to a bathroom in the hallway.

Detective Gillit immediately called for an ambulance to respond, based on [REDACTED] physical condition [REDACTED]

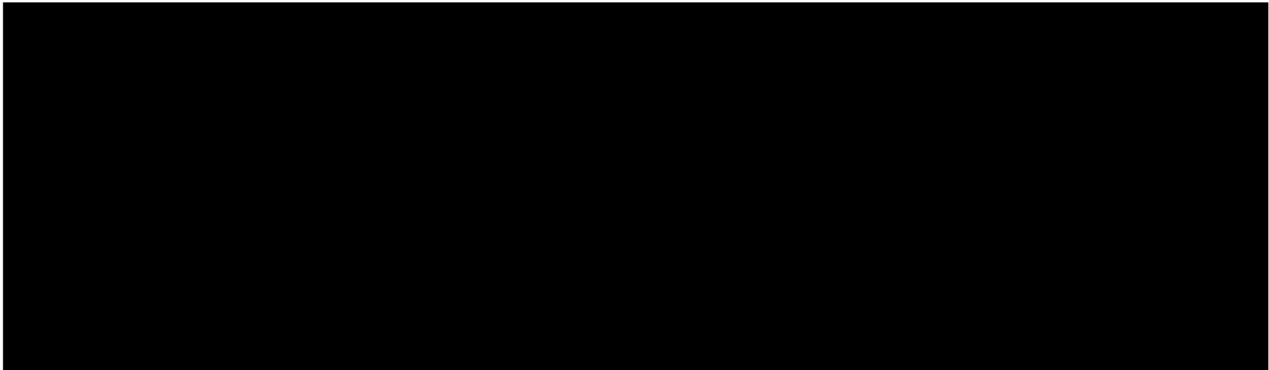
Detective Gillit also called for a uniformed cover car to respond. Detective Gillit observed that there were feces left in the toilet and Michael started leading [REDACTED] into the shower. Detective Gillit took photographs of the room that [REDACTED] came from and observed several soiled diapers in strewn around the room. Detective Gillit observed a mattress in the middle of the room with a box spring on the side both being covered in what smelled like urine and feces smeared in places on the top and sides. Detective Gillit observed several used paper plates and cups on the floor and bed.

Detective Gillit then exited the room and observed on one of the shelves in the hallway were pills in a bubble package. Detective Gillit observed that the date on the pills read 08/16/19 and were unopened. Detective Gillit observed several other packages of pills on other shelves that were partially used with older dates. Detective Gillit checked in on [REDACTED] who was in the shower and Michael appeared to be washing him. Detective Gillit took pictures of the downstairs to show the condition of the home and stood on the stairs near the door to be able to direct the ambulance to [REDACTED] once they arrived. Detective Gillit made contact with the ambulance at the front door and escorted them upstairs to the bathroom where Michael was still attempting to clear [REDACTED].

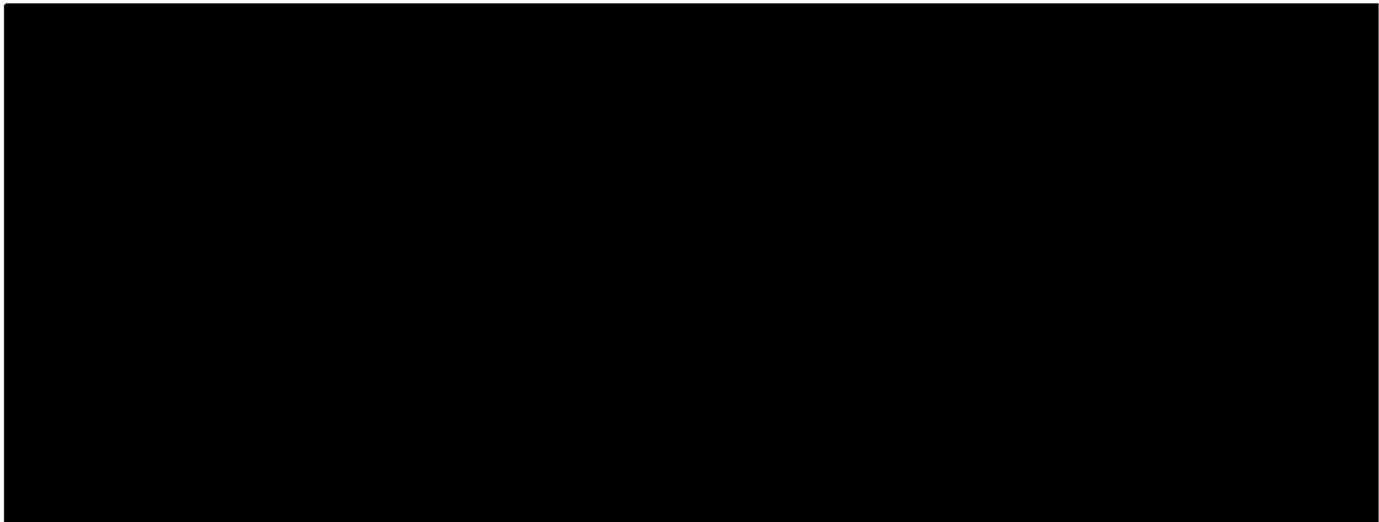
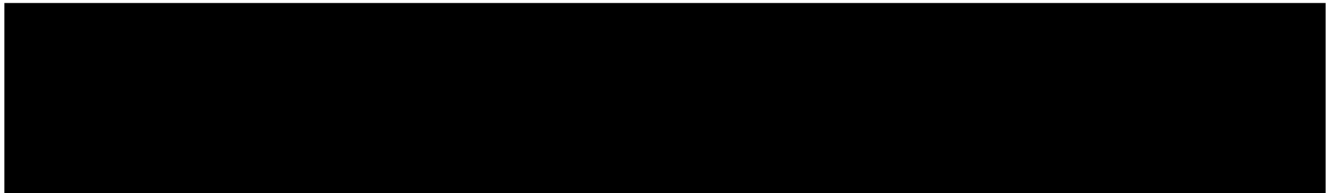
Detective Gillit then went to Rose Medical Center and made contact with the doctor that was going to be taking care of [REDACTED]. Detective Gillit was advised that [REDACTED] was drinking water very quickly and eating food vigorously as if he had not had food or water in a long time. Detective Gillit observed [REDACTED] lying on a hospital bed in a room with a sandwich in his hands as he was eating large bites of it and drinking from a cup.

Detective Gillit met with the listed suspect, Michael Hill (01/28/1982) in the front lobby of the Denver Police Administration building located at 1331 North Cherokee Street. Detective Gillit escorted Michael to the third-floor interview room and advised that the interview would be audio and video recorded. Detective Gillit advised Michael of his Miranda rights both written and verbal and acknowledged his understanding of each of his rights and agreed to voluntarily speak with Detective Gillit.

Michael stated that when Detective Gillit came to the house [REDACTED]
[REDACTED]



Michael states that he still hands in his paperwork and collects his paycheck. Michael stated that he spoke with [REDACTED] who stated that she knows that she gave Michael the medications.



[REDACTED]

[REDACTED]

[REDACTED]

Detective Gillit advised that he received information from the Denver management agency that they had not seen [REDACTED] in Michael's house in several months and Michael [REDACTED]

[REDACTED]

Detective Gillit asked Michael if he was aware that the Doctor actually stopped prescribing [REDACTED] his medications because he hadn't seen [REDACTED] in so long, and Michael confirmed that [REDACTED]

[REDACTED]

[REDACTED]

Detective Gillit asked Michael when he noticed [REDACTED] was starting to have trouble with his

eating and Michael advised [REDACTED]

Detective Gillit then asked about the condition of [REDACTED] room. Michael confirmed that [REDACTED]

Detective Gillit advised Michael that when he first came into contact with [REDACTED] he observed [REDACTED] in his naked state and stated that the physical state that [REDACTED] was in was "Horrible".

Michael stated that [REDACTED]

Detective Gillit advised Michael that the hospital indicated that [REDACTED] had not eaten or drank water in some time based on his consumption of food and water when offered to him in the Emergency room.

Detective Gillit advised Michael that there were several used diapers in [REDACTED] bedroom and he responded, "I honestly don't know where they would be from". Michael stated that [REDACTED] has access to the hallway to be able to get the diapers himself.

Detective Gillit advised that [REDACTED] does not have the mental capacity to understand that is something he needs to do for himself. Michael advised that he takes care of [REDACTED]

[REDACTED]

Detective Gillit asked Michael if he is capable of providing the level of care appropriate to the level of [REDACTED] needs to which Michael Responded [REDACTED]

Detective Gillit asked Michael why he didn't take [REDACTED] to the hospital after he lost so much weight [REDACTED] The interview was concluded.

Detective Gillit came into contact with the Reporting Part [REDACTED] [REDACTED] advised that they have had [REDACTED] with their services for over 3 years. [REDACTED] advised that [REDACTED] was the reason that he was hired because the company wanted a staff member that would be able to support him.

Detective Gillit was advised that they had to force Michael to come into the office so that they could see [REDACTED] and they did this by mandating that Michael come in person to collect his check.

[REDACTED] stated that the new [REDACTED] started doing the documentation to get all of their "Ducks in a row" to make a case to forward to police to include cancelled audits and forms that were not turned in. [REDACTED] stated that [REDACTED] saw [REDACTED] last and noted that [REDACTED] did not look well and appeared underweight. [REDACTED] stated that when [REDACTED] was removed from the home they had to bring him back in December of 2017 and at that time [REDACTED] was 110 pounds. [REDACTED] advised on a claim that was made by Michael that [REDACTED] hair had been shaven to make it easier to clean him. [REDACTED] stated that they did an investigation and found that claim to be untruthful and stated that was in November of 2017. [REDACTED] stated that [REDACTED] weight was supposed to be reported monthly, but that report was not provided by Michael. [REDACTED] stated that the program manager advised him that the last time [REDACTED] went to the doctor was approximately 2 years ago or last year with someone named [REDACTED]

Detective Gillit asked [REDACTED] when his company noticed that [REDACTED] was not getting medications. He said that it was when the nurse [REDACTED] made several negative attempts to deliver the medications to Michael.

Medical Records for [REDACTED] were provided to the Investigating Detective by [REDACTED]. Detective Gillit reviewed the medical records and observed the Emergency Room doctor [REDACTED] reported "The patient appears very malnourished. His vital signs are stable. We are offering him food and liquids. The patient is eating and drinking as if he has not had anything to eat or drink in several days." And listed his primary impression as "Dehydration"

and the secondary impression "Adult Neglect, Hyponatremia, Hypokalemia, Malnutrition, Transaminitis"

Detective Gillit observed the "Supervising Physician Note" which read "I have reviewed the PA/NP's note and plan of care. I was available for consultation as needed at all times during the patient's visit in the emergency department. I agree with the clinical impression, plan and disposition. Discussed case just after patient's arrival. Reviewed plan. Reviewed labs-patient appears significantly dehydrated. Patient will be admitted for further treatment and evaluation. APS involved." Electronically signed by [REDACTED] on 12/14/19 at 0820 then Electronically Signed by [REDACTED] MD on 12/14/19 at 1049.
Detective Gillit observed [REDACTED]

[REDACTED]

In reviewing this case file your affiant verified a serious bodily injury form was completed for [REDACTED] on March 12, 2020 [REDACTED] with Rose Medical Center signed this document that in his professional opinion [REDACTED] did suffer serious bodily injury due to a substantial; risk of serious, permanent disfigurement and a substantial risk of protracted loss or impairment of the function of any part or organ of the body.

Based on the foregoing, your affiant respectfully requests that an At Large Warrant be issued for the arrest of MICHAEL ROY HILL, DOB: 01/28/1982 for: NEGLIGENT SERIOUS BODILY INJURY TO AT-RISK PERSON, in violation of 18-6.5-103(2)(b)

I swear and affirm under oath, by administration of the oath over the telephone by the undersigned judge, that the below electronic signature is my own and that the contents of this Affidavit are true and accurate.


Affiant:  DA91 5/13/22
INVESTIGATOR

Review & Approval

<i>/s/ Jane Walsh</i>	CHIEF DEPUTY DA JANE WALSH #39534	May 12, 2022
District Attorney – Signature	District Attorney – Printed name & Registration #	Date and Time

In accordance with § 16-1-106 and § 16-3-108, the above-named Affiant swore and affirmed under oath over the telephone to the undersigned judge that the electronic signature is that of the named Affiant and that the contents of this Affidavit are true and accurate.

Dated this 13th day of May, 2022, at 0900 AM / PM.



Signature of Judge

David Blackett

Printed name of Judge