

11M2668

AFFIDAVIT IN SUPPORT OF WARRANTLESS ARREST

Defendant: Amanda Sue Jolliff

DOB: 11-30-1974

Agency Case Number: 11-3067

Arresting Agency: ERIE POLICE DEPARTMENT

Date of Arrest: 09-28-2011

Charge	Statute No.	Class
1: Crime Against At Risk Juvenile	18-6.5-103(6)	M1
2: Child Abuse (Knowingly)	18-6-401	M2
3: False Imprisonment	18-3-303	M2

FILED IN WELD COUNTY  
COMBINED COURTS  
2011 SEP 29 A 8:00

I, Corporal Aaron Haddox, of the Erie Police Department, being duly Sworn upon oath says that there is probable cause for the warrantless arrest of the above-named defendant for the charges stated above, and that the following facts are true and correct to the best of my knowledge, information, and belief and support the arrest of the defendant, to wit:

On 09-27-2011 at about 2226 hours, I, Corporal A. Haddox, responded to [redacted] to speak with Chad Buss in reference to an unknown type of problem. Upon arrival, Chad advised me that he had located a neighbor child underneath his porch on this date. Chad identified the child as [redacted] (Dob:05-31-1997), age 14. It was later found that [redacted]'s legal name is [redacted], but that he only goes by the name "[redacted]" Chad stated that [redacted] resides at [redacted] Town of Erie, County of Weld, State of Colorado.

Chad told me that [redacted]'s mother, Amanda Jolliff (Dob:11-30-1974), had potentially abandoned [redacted] and had left to New York 2 weeks ago with her boyfriend, Richard Smith (Dob:01-18-1980). Chad stated that Amanda's bus ticket was a one way bus ticket. Chad stated that [redacted] was supposed to be left with his father, Quint Gilman (Dob:01-03-1964)(not biological) and his sister, [redacted] (Dob:08-05-1995). Chad stated that Quint and [redacted] moved out of the trailer today and that [redacted] was somehow left behind.

I spoke with [redacted] and [redacted] advised me that Quint and [redacted] made the decision to move out while Amanda was away. [redacted] stated that he was included in the plan to move, but that [redacted] told him that he would have to wait another day to leave. [redacted] stated that he was given \$5.00 and left on his own to find a place to stay for the night. [redacted] stated that he was too afraid to ask Chad to spend the night and crawled underneath Chad's porch to sleep for the night.

I conducted an interview with [redacted] at the Erie Police Department. [redacted] told me that he has been a victim of child neglect while living in the home with Amanda, Richard, [redacted] and Quint. [redacted] stated that he was removed from school in 2008 and is registered as a home schooled student, but has not received instruction since 2008. [redacted] stated that his windows to his bedroom are boarded up and that there is a chain type lock on the outside of his door. [redacted] stated that he remains locked up for most of every day. [redacted] stated that in a normal day, he is let out of his room at 0800 hours to take care of the ducks. [redacted] is then locked again inside his room until 1500 hours when he is let out to clean. [redacted] stated that he is locked in his room again until about 1830 to 1900 hours when he is let out for dinner. [redacted] told me that he is again locked in his room after dinner and left there until the following morning. [redacted] advised me that he is only fed one meal a day which is macaroni or spaghetti. [redacted] stated that he never gets breakfast or lunch and that he doesn't eat on some days. [redacted] stated that he usually only eats 4 meals a week. [redacted] told me that this has been his daily routine since early 2008.

[redacted] reported that Amanda, Richard, and [redacted] all had locked [redacted] in his room over the years, but that Amanda instructed the others to do it. [redacted] stated that Quint was aware that he was being locked in his room, but did nothing about it.

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Officer Simmonds conducted an interview with Chad's son, [REDACTED], and was told that [REDACTED] has observed the boarded windows inside [REDACTED]'s bedroom and the lock on the outside of [REDACTED]'s door.

I applied for and obtained a search warrant for [REDACTED] on 09-28-2011 at about 0224 hours. Members of the Erie Police Department executed this search warrant at 0237 hours. During the warrant service, Amanda and Richard were located inside the residence. Amanda was unaware that her children were missing.

Upon entering the residence, I detected an overpowering odor of animal urine and feces. My nose began running, my throat became irritated, and my eyes were burning. I observed mice running everywhere in the residence as I walked through. The entire residence was contaminated with mice droppings on all surfaces. Officers located 1 dog outside and 2 dogs, 2 ducks, 1 macaw, 1 cockatoo, 2 cockatiels, and four toads living inside the residence.

I located [REDACTED]'s bedroom on the southeast corner of this residence. It was exactly as described in witness interviews. The door was comprised of a sheet of plywood reinforced with 2X4's. There was a chain lock affixed to the outside of the door. I entered the room and found that it was a very small room which was completely filled with junk and a soiled mattress with no sheets. The only window in this room was boarded up as described. The roof had an apparent leak and hole in the ceiling.

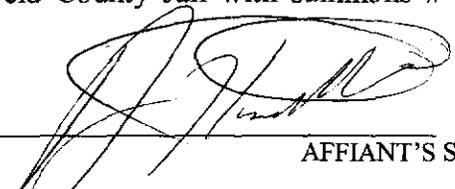
I checked the kitchen area and found that mice and mice droppings were present on every surface. The refrigerator held little to no food and mice droppings were present there as well. I checked the pantry and saw several boxes of spaghetti noodles and most were chewed open by mice and mice droppings were present here as well.

I was later advised by Corporal P. Lukens that he has had several dealing with this family and knows that [REDACTED] is an at risk child and suffers from a mental disorder.

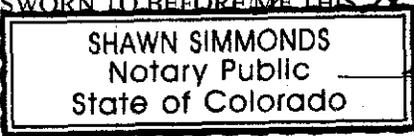
I conducted an interview with Amanda Jolliff at about 0435 hours. Amanda read and signed a waiver of her Miranda rights prior to any questioning. During this interview, Amanda confirmed that [REDACTED] is "Developmentally Delayed." Amanda claimed that her house was not in the poor condition it was on this date when she left for New York. Amanda stated she was aware of the lock on the outside of [REDACTED]'s door and stated it was placed there because [REDACTED] had once run away. Amanda initially stated that [REDACTED] is only locked in at night, but later changed her statement. Amanda stated, "I used to lock him in there a little more." Amanda then added that [REDACTED] "used to irritate me really bad." I asked Amanda what "a little more" was and Amanda stated that she locked [REDACTED] in his room when she got upset with him or when he got in trouble. Amanda confirmed that she, Richard, and [REDACTED] have all at one time or another locked [REDACTED] inside the room.

Both Amanda and Richard were placed under arrest, each for one count of Crime Against an at Risk Juvenile, 18-6.5-103(6), a class 1 Misdemeanor, one count of Child Abuse Knowingly, 18-6-401, a class 2 Misdemeanor, and one count of False Imprisonment, 18-3-303, a class 2 Misdemeanor.

Amanda was transported to the Weld County Jail with summons # C001451 and C001452 for the above mentioned charges.

  
AFFIANT'S SIGNATURE

SUBSCRIBED AND SWORN TO BEFORE ME THIS 24 DAY OF 9, 2011

EXPIRATION DATE  NOTARY PUBLIC

AFTER REVIEWING THE ABOVE AFFIDAVIT IN SUPPORT OF A WARRANTLESS ARREST, I FIND:

**AFFIDAVIT IN SUPPORT OF WARRANTLESS ARREST**

Defendant: Amanda Sue Jolliff

DOB: 11-30-1974

Agency Case Number: 11-3067

\_\_\_\_\_ THERE IS PROBABLE CAUSE FOR THE ARREST.

\_\_\_\_\_ THERE IS NOT PROBABLE CAUSE FOR THE ARREST AND THE DEFENDANT IS RELEASED FROM  
CUSTODY.

DATE: \_\_\_\_\_

\_\_\_\_\_  
JUDGE