

**INDEPENDENT ETHICS COMMISSION - Formal Complaint Form**

**BEFORE THE INDEPENDENT ETHICS COMMISSION  
OF THE STATE OF COLORADO**

**CASE NO.** 15-31  
(IEC use only)

**COMPLAINT**

**The Complainant(s) is (are):**

GREG GIETHL

**Address (Include City and Zip Code)**

P.O. Box 3434  
LAGOSA SPRINGS 81147

**Daytime Phone No.**

970-946-0526

**Email:**

g1r2e3gA@live.com

**The Respondent(s) is (are):**

TODD STARR

**Address (Include City and Zip Code)**

462 LEWIS ST.  
LAGOSA SPRINGS CO  
81147

**Daytime Phone No.**

970 317 2570

**Email:**

WJU. ROSE WALKER.COM

**The specific act or things complained of, with the facts to give a full understanding of the situation, is (are):**

SEE ATTACHED COMPLAINT  
TODD STARR, FORMER ARCHULETA COUNTY  
ATTORNEY

## Colorado Independent Ethics Commission Complaint

Todd Starr, former Archuleta County Attorney

On or about September 22, 2015, Archuleta County Attorney Todd Starr, engaged in a conspiracy to commit violations of CRS 18-8-404(1)(a)+(c), first degree abuse of office and official misconduct, to obtain benefit to himself, and knowingly, did initiate negotiation of a contract, for his post government employment, to provide legal services to Archuleta County, violating CRS 24-18-201, interests in contracts, and violating CRS 18-8-407, embezzlement of public property.

Todd Starr tendered his resignation as County Attorney for Archuleta County, on September 21, 2015, to take effect as of October 21, 2015. This fact makes Todd Starr ineligible to contract with, or be employed by, any firm that contracts with, any state government agency to provide the same services while he was in the governments employ.

Public notice of a Special Meeting on September 22, at 8:00 am, for the Board of Adjustment, had been posted.

<http://www.archuletacounty.org/Calendar.aspx?EID=1179&month=9&year=2015&day=18&calType=0>

No public notice was posted, for a Special Meeting, to be held at 7:30 am, on September 22, 2015, about personnel or legal services policy changes.

<http://co-archuletacounty.civicplus.com/AgendaCenter/ViewFile/Agenda/09222015-351>

Special Meeting and Executive Session held at 7:30 am September 22, participated in by Todd Starr violated CRS 24-6-402, open meetings law.

The Archuleta County Board of County Commissioners (BOCC) signed a legal services contract with Todd Starr and the firm of Rose Walker Starr, LLP, on October 2, 2015.

<http://www.archuletacounty.org/AgendaCenter/ViewFile/Item/1851?fileID=1816>

<http://co-archuletacounty.civicplus.com/AgendaCenter/ViewFile/Agenda/10062015-352?html=true>

As of October 2, 2015, a firm by the name of Rose Walker was listed with the Secretary of State, but no Rose Walker Starr.

*This contract constitutes commission of overt acts in violation of CRS 18-8-404, abuse of public office, first degree official misconduct, by Todd Starr, obtaining benefit for personal financial gain to Mr. Starr. Todd Starr did commit second degree official misconduct, CRS 18-8-405(1)(b), for violation of any statute or lawfully adopted rule or regulation relating to his office. As County Attorney Todd Starr did initiate a conspiracy to create this contract and violate CRS 24-18-201. Todd Starr did commit a violation of CRS 18-8-407, embezzlement of public funds, by establishing this contract and receive public funds.*

In 2010, Mr. Starr was involved in another unauthorized Executive Session that he personally blocked public knowledge of, and was subsequently investigated by this office, and reprimanded for filing false documents in court surrounding that meeting and investigation into the recording of that meeting.

The full depth of the conspiracy and whether or not Todd Starr received pay from Archuleta County and Rose Walker to provide the same service at the same time, double dipped, won't be known until further

The remedy to the matter I (we) would like is:

SEE ATTACHED STATEMENT

I (We) hereby acknowledge that I (we) will cooperate in this Complaint and will appear at any hearing if the Complaint is set for hearing.

Signature(s): \_\_\_\_\_

Attorney (if applicable): \_\_\_\_\_

Dated at LAGUNA SPRINGS, Colorado, this 20 day of NOVEMBER, 2015.

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investigation of the matter occurs. As it stands, Mr. Starr has directed the County to block CORA request for the recording of the Executive Session on Sept. 22 and payroll discovery has not been accomplished.

A series of articles into the matter can be found here:

<http://www.pagosasun.com/?s=county+legal+services&x=0&y=0>

All recorded minutes of BOCC meetings can be found here:

<http://co-archuletacounty.civicplus.com/AgendaCenter>

This matter should be presented to the Grand Jury for investigation of these matters for criminal prosecution to the fullest extent of the law.

Todd Starr should also be professionally sanctioned for conduct unbecoming of an attorney.

The contract between Rose Walker Starr, in the interest of public good, must be terminated.

All funds received by Todd Starr, and or Rose Walker Starr, must be returned to the People and Punitive damages sought.