

FORMAL CRIMINAL COMPLAINT: AGGRAVATED PUBLIC CORRUPTION AND BRIBERY

TO: Attorney General Phil Weiser, Office of the Colorado Attorney General

TO:

FROM: Chris Sutton

DATE: February 22, 2026

SUBJECT: INVESTIGATION INTO A "PAY-TO-PLAY" BRIBERY SCHEME BY BRAD MILLER AND ErBOCES

I am filing this formal criminal complaint to request an immediate multi-jurisdictional investigation into a documented public corruption and bribery scheme orchestrated by the organization ErBOCES and its legal counsel, Brad Miller. The evidence, derived from public records and internal communications, details a felony bribery offense by ErBOCES/Miller and multiple statutory violations by former Pueblo County School District 70 (D70) Board President Anne Ochs.

PRIMARY PERPETRATORS: Brad Miller (Attorney) and ErBOCES

SECONDARY PERPETRATOR: Anne Ochs (Former D70 Board President)

STATEMENT OF OFFENSE:

The evidence establishes a clear "quid pro quo" where ErBOCES and Brad Miller conferred a pecuniary benefit (a six-figure salary employment contract) upon a public servant, Anne Ochs, specifically to influence her official discretion regarding the approval of a "test case" school project (Riverstone). Ms. Ochs accepted this benefit, signed the contract 15 days prior to her vote, and knowingly failed to disclose her financial interest, in direct violation of Colorado law.

FACTUAL TIMELINE OF CORRUPTION:

1. THE SOLICITATION (June 4, 2025): Attorney Brad Miller (Primary Perpetrator) emailed Anne Ochs requesting a fast-tracked Memorandum of Understanding (MOU) for the "Riverstone" project by June 24. Miller explicitly stated the project was intended as a legal "test case" to challenge state/federal laws. Evidence: "The Miller Email," dated 06/04/2025 and released to the public under fiduciary obligation.
2. THE INDUCEMENT/BRIBE (June 9, 2025): Five days after Miller's request, ErBOCES (Primary Perpetrator) executed a formal employment contract with Anne Ochs for the position of HSE Program Coordinator and Part-time Programs. Evidence: ErBOCES Signed Contract, 06/09/2025.
3. THE PERFORMANCE (June 24, 2025): While a contracted employee of ErBOCES, Ms. Ochs presided over the D70 Board Meeting. She moved to approve the ErBOCES MOU (Item 12.1) and voted "Yes." She failed to file a 72-hour written disclosure of this conflict as mandated by C.R.S. 18-8-308. Evidence: D70 Official Meeting Minutes, 06/24/2025.

4. CONCEALMENT & RESIGNATION (Dec 9, 2025): Ms. Ochs resigned her position only after the specific June 9th signing date was publicly exposed, effectively admitting the existence of a pre-planned conflict of interest.

CRIMINAL STATUTES CITED:

- C.R.S. § 18-8-302 (Bribery - Class 3 Felony): ErBOCES and Brad Miller conferred a benefit to influence a public vote.
- C.R.S. § 18-8-308 (Failure to Disclose Conflict of Interest - Class 2 Misdemeanor): Anne Ochs failed to report her employment status before a discretionary vote.
- C.R.S. § 18-8-404 (First Degree Official Misconduct - Class 1 Misdemeanor): Anne Ochs knowingly violated her duty to obtain a personal benefit.

I request that the Attorney General and the Pueblo County Sheriff's Office subpoena all internal records of ErBOCES and Brad Miller to investigate the full extent of this pattern of conduct.

Respectfully,

Chris Sutton

Additional criminal has likely occurred in connection to those already uncovered.

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SOURCES & SUPPORTING EVIDENCE:

1. Pueblo County School District 70 Official Board Minutes (June 24, 2025).
2. Internal Email from Brad Miller to Anne Ochs regarding ADF Test Case (June 4, 2025).
3. ErBOCES Signed Employment Contract / Personnel Report (June 9, 2025).
4. "D70 board president resigns after conflict of interest revealed," Chalkbeat Colorado (Dec 2025).