

County Court, City and County of Denver, Colorado Lindsey-Flanigan Courthouse, Room 160 520 W. Colfax Ave. Denver, CO 80204	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> Case Number: <b>15CR03981</b>  Div.: <b>Criminal</b> Ctrm: _____
Plaintiff: The People of the State of Colorado  Defendant: <b>MARK IANNICELLI</b>	
Mitchell R. Morrissey, Reg. No. 13784 District Attorney, Second Judicial District By the undersigned Deputy District Attorney 201 West Colfax Ave., Dept. 801 Denver, CO 80202 Phone Number: 720-913-9000 Fax Number: 720-913-9035	
<b>COMPLAINT AND INFORMATION</b>	

**SEVEN CHARGES:**

- COUNT 1: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 2: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 3: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 4: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 5: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 6: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**
- COUNT 7: JURY TAMPERING, C.R.S 18-8-609 (F5) {26052}**

**ECONOMIC CRIME UNIT**

Bond set at: \$ \_\_\_\_\_ Judge: \_\_\_\_\_ Date \_\_\_\_\_  
Signature

Mitchell R. Morrissey, District Attorney for the Second Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the county of Denver:

**COUNT 1: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED], a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 2: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED], a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 3: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED], a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 4: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED], a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 5: JURY TAMPERING (F5)**

On or about July 27, 2027, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED] a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 6: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED] a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

**COUNT 7: JURY TAMPERING (F5)**

On or about July 27, 2015, MARK IANNICELLI, with intent to influence a juror's vote, opinion, decision, and other action in a case, namely: JURY POOL MEMBER, unlawfully and feloniously attempted directly and indirectly to communicate with [REDACTED] a juror, other than as a part of the proceedings in the trials of the case; in violation of section 18-8-609, C.R.S.

All offenses against the peace and dignity of the People of the State of Colorado.

# STATEMENT OF PROBABLE CAUSE

GO# 2015-424309

AB# 2015-31470

Page 1 of 1

<b>DEFENDANT</b>					
Last Name IANNICELLI	First Name MARK	Middle	DOB 05/05/1959	Arrest Date 07/27/2015	Arrest Time 11:29 am
Armed with UNARMED					
Location of Arrest 520 W COLFAX AVE					

<b>OFFICER MAKING STATEMENT</b>	
Name MUDLOFF, BRIAN D.	Serial No. P06149

**COMPLETE THIS SECTION FOR ORIGINAL PROBABLE CAUSE STATEMENTS AND ALL AFFIDAVITS FOR ARREST WARRANT**

I am a police officer for the City and County of Denver, Colorado, and have knowledge regarding the arrest/incident of the above named party for the below listed offense, which offense occurred on or about the date of 07/27/2015 at 10:18 am at or near the location of 520 W COLFAX AVE in the City and County of Denver, State of Colorado.

VIOLATION(S)	DESCRIPTION
18-6-609	INV HOLD-JURY-TAMPERING [026517]

The probable cause of the arrest of the above-named individual is as follows:  
 [The defendant, Mark Iannicelli (05/05/59), was identified by Denver District Attorney Lamar Simms, as handing out literature in front of 520 W Colfax Ave, the Lindsey Flannigan Court House, to actual and potential state and city jury members. A cardboard sign with "Juror Info" was positioned at the entrance to the court house. Several jurors were contacted by Denver Police Intelligence Unit and were found to be in possession of fliers handed out by the defendant. The defendant was identified to reporting officers by members of the Intelligence unit. Upon contact, officers explained the reason for the contact, including that police had been informed of the defendant handing out information to potential jurors. When asked for his name and date of birth, the defendant refused to provide any information. The defendant was taken into custody for investigation of Jury Tampering, and a Colorado Driver's License was located in his wallet. The fliers were recovered as evidence and were titled, "All You Need To Know About Jury Nullification".  
 At the time of the offense, a death penalty case was underway at the same location, 520 W Colfax Ave.]

JUL 28 2015  
PC FOUND

*Kerry S. Hoke*

Paper Documents sent for Scanning:  
 Advisement [N/A] Victim Statement(s) [N/A] How many? [ ]  
 Witness Statement(s) [No] How Many? [ ]  
 Request for Presumptive Screening [N/A]  
 Miscellaneous  
 [ ]

DOMV Additional Required Information:  
 Medical Release (HIPPA)/Victim Diagram (from DOMV Case Summary) [N/A]  
 ID of Suspect (Photo of w/victim signature on back) [N/A]  
 I affirm this information to be true and correct.  
 Officer: MUDLOFF, BRIAN D. Serial No: P06149