



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

January 13, 2016

Colleen Brisnehan
Hazardous Waste Corrective Action Unit
Hazardous Waste Program
4300 Cherry Creek Drive S., Denver, CO 80246-1530

Via: email: ctbrisne@smtpgate.dphe.state.co.us, colleen.brisnehan@state.co.us

RE: 79 Regulatory violations during Screening Level Assessment, 413 W Easter Ave. Littleton CO 80120

Dear Ms. Brisnehan:

Forensic Applications Consulting Technologies, Inc. (FACTs) has begun a series of regulatory audits of reports submitted to the Colorado Department of Public Health and Environment (CDPHE) pursuant to 6 CCR 1014-3 “*Regulations Pertaining To The Cleanup Of Methamphetamine-Affected Properties.*” FACTs performed a detailed regulatory audit for a report completed by one of your colleagues, Mr. Robert Woellner, (this is the consultant whom you have personally assisted with the collection of unlawful samples, with the apparent intent to defraud the property occupant)¹. The report we have audited is titled:

Robert A. Woellner
Residence at 413 W Easter Ave Littleton CO 80120
Methamphetamine Preliminary Assessment Inspection,
Sampling & Recommended
Scope of Work
Prepared for:
Cheryl London
7740 S. Kit Carson Drive
Centennial CO, 80122
February 6, 2015

As you know, this untrained consultant, has an extensive history of willful regulatory violations, invalid drug laboratory assessments, falsification of information relating to real estate documents, and claims to his credentials that are unsupported.^{2,3,4,5,6,7,8,9,10,11,12,13} Thus far, since January 13, 2016, FACTs has identified

¹ 100 W. Spaulding Street, Lafayette, Colorado http://forensic-applications.com/meth/Spaulding_Regulatory_audit_Redacted.pdf

² 131 South Benton Street Denver, CO <http://forensic-applications.com/meth/censoredcriticalreview.pdf>

³ 4893 S Johnson Street, Denver http://www.forensic-applications.com/meth/Johnson_Critical_review.pdf

⁴ 788 W. Lois Ct., Louisville, CO 80027

no fewer than 3,159 (three *thousand*, one hundred fifty nine) willful and knowing regulatory violations of 6 CCR 1014-3 by your colleague.

In our detailed audit of the above report, FACTs has discussed the following violations:

Rubric and Violations	FACTs Audit Page Number
Failure to Provide Qualified Personnel	4
Violation of Section 4.0	4
Failure to Comply with Section 4	6
Failure to Comply with 4.2	6
Failure to Comply with 4.3.1	6
Attic 1 (9 Violations)	8
Attic 2 (9 violations)	8
Inability to Comply with 4.4.2	9
Failure to Comply with Paragraph 4.5	9
Failure to Comply with Paragraph 4.6	9
Failure to Comply with Paragraph 4.8	10
Failure to Comply with Section 4.9	10
Failure to Comply with Section 4.10	11
Violation of Paragraph 4.14 (19 violations)	12
Violation of Paragraph 4.15	13
Violation of Paragraph 4.15.1 (2 Violations)	13
Violation of Paragraph 4.15.3 (2 Drawing Violations)	14
Violation of Paragraph 4.17	14
Violation of Paragraph 4.17.1 (5 Violations)	14
Violation of Paragraph 4.17.4	14

⁵ 1138 West 32nd Street, Unit 201, Denver, (229 violations – detailed report is pending)

⁶ 48400 Routt County Road 56C, Steamboat Springs, CO 80487 (54 violations – detailed report is pending)

⁷ 11767 Grant Street, Northglenn, Colorado 80233 (113 violations) http://www.forensic-applications.com/meth/Addendum_7_Woellner_11767_Grant.pdf

⁸ 690 S. Lincoln Street, Denver, CO 80203 (769 violations) http://forensic-applications.com/meth/Woellner_Lincoln_Clearance_RA.pdf

⁹ 8347 S Reed Street, Unit 2, Littleton CO 80128 (121 violations) http://forensic-applications.com/meth/Addendum_6_Woellner_Reed2_Redacted.pdf

¹⁰ 410 E 32nd Ave Avenue in Carbondale, CO 81623, (198 Violations) http://forensic-applications.com/meth/QUEST_Garfield_PA_RA.pdf

¹¹ Clearance report for 410 E 32nd Ave Avenue in Carbondale, CO 81623 (366 Violations) http://forensic-applications.com/meth/Woellner_Garfield_Clearance_RA.pdf

¹² Preliminary Assessment 8172 East 132nd Avenue, Thornton CO (385 Regulatory Violations) http://forensic-applications.com/meth/QUEST_132nd_Ave_PA_RA.pdf

¹³ See: Screening Assessment (101 Regulatory violations) 413 W. Easter Avenue in Littleton, CO 80120, http://forensic-applications.com/meth/QUEST_Easter_Screening_RA.pdf

Violation of Paragraph 4.17.5 (2 Violations)	15
Violation of Paragraph 4.18	15
Violation of Section 6	15
Violation of Section 6.1.3.2	16
Violation of Section 6.1.3.3	16
Violation of Section 6.1.3.5	17
Violation of Paragraph 6.2.7, 6.2.9, 6.2.10 (6 Violations)	17
Violation of Paragraph 6.2.12.1	18
Violation of Paragraph 6.2.14	18
Violation of Paragraph 6.2.14.6 (7 violations)	18
Violation of Section 6.2.14.8 (7 Violations – Collection Time)	18
Violation of Paragraph 6.2.14.11	19
Colorado Criminal Code CRS 18-5-113. Criminal impersonation	19
Colorado Criminal Code – Fraud; Offering a false instrument for recording	20
Colorado Consumer Protection Act	21

As it is, you have known for approximately one year about these regulatory violations and you have known of the unlawful remediation that occurred in the structure, and Mr. Woellner’s falsified the “clearance certification.” (We have documented approximately 592 regulatory violations in that audit which we will send to your office shortly).

As such your office has knowingly allowed innocent occupants to enter and occupy the contaminated building. Naturally, we are concerned for the victims, and the public safety of the innocent occupants, as well as the construction personnel , who may be exposed to potentially toxic materials. We recommend your office notify the building owner of the fraudulent work, falsified documents, and recommend the occupants leave the building.

This communication is being sent to your office in good faith pursuant to pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

Kind regards,



Caoimhín P. Connell

Forensic Industrial Hygienist

CC: Daniel S. Miller, Senior Assistant Attorney General

CC: Howard Thigpen, Esq.