



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

**Regulatory Audit
of**

**Documentation Regarding a
Methamphetamine Affected Property
Located at
3731 S. Uinta St.
Denver, CO 80237**

(408 Regulatory Violations of 6 CCR 1014-3)

Prepared by:

FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

185 Bounty Hunter's Lane
Bailey, CO 80421



January 5, 2016

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EXECUTIVE SUMMARY

Forensic Applications Consulting Technologies, Inc. (FACTs) is an independent, Industrial Hygiene consulting firm providing independent consulting services for both the private sector and the public sector.

On November 10th, 2016, an illegal drug laboratory was discovered at 3731 South Uinta Street in Denver, CO.¹

Following the discovery, a consultant with a known history of fraudulent assessments was hired by the registered owner of the property to perform a regulatory assessment. At the request of our client, FACTs was provided with Public Domain copy of that assessment and asked to perform an objective regulatory audit of the documents.

This audit pertains to the documents identified as:

CLEARANCE ASSESSMENT REPORT

Property Location
3731 S. Uintah (*sic*) St.
Denver, CO 80237
Prepared For
Michael Ross
4750 E. Amherst Ave.
Denver, CO 80222
Prepared By
Foothills Environmental, Inc.
11099 West 8th Avenue
Lakewood, CO 80401
November 21 2016
FEI Project Number: ME16037

The contractor involved, FEI has an extended history of falsifying reports, false claims, and, knowingly, with the intent to defraud their clients, issuing false compliance certifications. For this property, the contractor failed to perform the mandatory sampling necessary to clear a property. The contractor failed to collect samples from the mandatory locations, the contractor failed to collect samples in the mandatory fashion, the contractor failed to collect the required number of samples, and the contractor used a home-made “do-it-yourself” sampling protocol that is not permitted by regulations. Furthermore the contractor failed to perform many of the other activities as required by regulations. FACTs has identified no fewer than 408 regulatory violations in the assessments.

Based on the best information available, at the time of this audit, an illegal drug laboratory continues to exist at the property, and entry into the property remains restricted by regulation and statutes.

¹ Industrial Hygiene Assessment Resulting in the Discovery of an Illegal Drug Laboratory At: 3731 South Uinta Street, Denver, CO Prepared by: Forensic Applications Consulting Technologies, Inc. 185 Bounty Hunter’s Lane, Bailey, CO 80421 November 10, 2016



The purpose of this review is to document regulatory violations associated with the assessment of methamphetamine affected properties (6 CCR 1014-3). The level of scrutiny and detail employed in this review is that which has been established by the Colorado Department of Public Health and Environment (CDPHE).

This audit has been prepared by Forensic Applications Consulting Technologies, Inc. pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

Regulatory Misconduct

Currently, criminal misconduct has greatly complicated the ability of a property owner to bring a property into compliance with pertinent regulations. During the last several years, Ms. Coleen Brisnehan with the CDPHE has been engaged in the illegal falsification of documents related to real estate compliance issues, including knowingly, with the intent to deceive, falsifying documents association with Real Estate transactions.

The contractor for this property, Foothills Environmental Inc. has an extended history knowingly performing invalid assessments in methamphetamine affected properties, falsifying it's reports, and, knowingly with the intent to defraud their client, falsifying the regulatory compliance status of a property.^{2,3,4,5}

In turn, FEI is permitted by Ms. Brisnehan to perform illegal assessments, and is permitted to falsify documents under the unlawful protection of Ms. Coleen Brisnehan with the CDPHE.

For example, Mr. Andrea Gonzales with Foothills Environmental, Inc. performed an invalid screening assessment at a property located at 4383 Tennyson Street, Denver, CO 80212, for which there were no fewer than 343 regulatory violations. The work was performed for Ms. Melanie Granberg, an attorney with Gablehouse Granberg, LLC. Ms. Granberg served on the Board of Directors of a private commercial organization called "Colorado Association of Meth and Mold Professionals" (CAMMP). In violation of Colorado Revised Statutes, CRS §24-50-117⁶ Ms. Brisnehan with the CDPHE also served on the same board, while simultaneously acting as a regulator with the CDPHE.

² See for example: Regulatory Audit for PRELIMINARY ASSESSEMENT (sic) FOR METHAMPHETAMINE CONTAMINATION Property Location: 1170 Garrison Street, Lakewood, CO, Prepared By Foothills Environmental, Inc. 1320 Simms Street, Suite 102, Golden, CO 80401 March 9, 2009 http://forensic-applications.com/meth/Censored_Compliance_Audit.pdf

³ See for example: 767 West Cleveland Circle, Lafayette, Colorado 80026 (4/18/2015) Documenting 110 violations; audit available from: http://forensic-applications.com/meth/FEI_Screening_Cleveland_RA.pdf

⁴ See for example: 2301 Pearl Street, Apt. #29, Boulder, CO 80302 http://www.forensic-applications.com/meth/FEH_Pearl_PA_C_RA.pdf

⁵ See for example: 4383 Tennyson Street, Unit 3A, Denver, Colorado 80212 http://www.forensic-applications.com/meth/FEI_Tennyson_SA_CA_RA.pdf

⁶ Prohibited activities of employees



During the work on the Tennyson Street property, Ms. Brisnehan extending unlawful benefits to her fellow board member by virtue of knowingly fabricating materially false statements on a public record intended to be filed with a public office in an attempt to hide the invalid assessment performed by Foothills Environmental.⁷

Since the promulgation of the new regulations, FACTs has only reviewed five assessments by FEI, wherein we have identified no fewer than 1,144 (one thousand, one hundred and forty four) regulatory violations. In violation of 6 CCR 1014-3 Part 3, Ms. Brisnehan with the CDPHE has failed to perform the actions required of her by law, and has failed to address any of the regulatory violations by FEI, instead, as documented elsewhere, Ms. Brisnehan has knowingly, with the intent to commit fraud, falsified the public record related to real estate transactions, and attempted to hide the regulatory violations.

Thus far, to our knowledge, FEI has never performed a valid regulatory assessment in the State of Colorado.

PRELIMINARY ASSESSMENT

During the performance of a Preliminary Assessment of a methamphetamine affected property, the Consultant is *required* by regulations to perform specific mandatory tasks and provide specific mandatory documentation, however those regulatory requirements were not met by FEI on this property as described in the following sections.

Violation of §4.0 Preliminary Assessment.

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform and fulfill specific elements that constitute a Preliminary Assessment. For this project, FEI failed to perform those activities as delineated below.

Violation of §4.3.1 (4 Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:

4.3 Description of structural features in all buildings, such as attics, false ceilings, crawl spaces, and basements, including:

4.3.1 If the building has an attic, a description of the integrity of the building ceiling (i.e., attic floor), any signs of access, storage, manufacturing, or venting into the attic (e.g., holes cut in ceiling for the purpose of venting gases from a cook), and

In violation of the regulations, FEI failed to perform this mandatory activity and entirely failed to provide a description of the integrity of the building ceiling (i.e., attic floor), and failed to address any signs of access, storage, manufacturing, or venting into the attic.

⁷ A detailed description of the illegal activities can be found here: http://www.forensic-applications.com/meth/FEI_Tennyson_SA_CA_RA.pdf



In violation of the regulations, FEI failed to perform this mandatory activity and entirely failed to provide a description of any signs of access, storage, manufacturing, or venting into the attic.

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:

4.3.1 ...a description of observations of the ducting associated with all bathroom and kitchen exhaust vents.

Although bathroom exhaust vents and a separate kitchen exhaust vent was present and those vents penetrated the ceiling (see photographs below), FEI failed to meet this mandatory requirement, and did not even take notice of the existence of those vents and did not provide any description of those vents.



**FACTs Photographs
November 2, 2016**

Therefore, Mr. Ronald Crandall, CIH, entirely failed to meet the following mandatory regulatory obligations:

1. Failure to provide a description of the integrity of the building ceiling
2. Failure to provide a description signs of access, storage, manufacturing, or venting into the attic
3. Failure to provide a description of the kitchen exhaust vent(s) into the attic
4. Failure to provide a description of the bathroom vent(s) into the attic

Violation of §4.3.2

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:

4.3.2 A description of the integrity of the building floor, ...



Nowhere in the report do we find where FEI has provided the mandatory inspection or description. In the past, for documents reviewed by FACTs, FEI has simply falsified the information in their reports,⁸ or otherwise, has relied on Ms. Brisnehan (CDPHE) to falsify public documents to cover-up the violations.⁹

Violation of § 4.5

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

4.5 Identification of manufacturing methods based on the Consultant's observations and law enforcement reports, if available.

There is no documentation to indicate that the author of the report has ever received any kind of training in illegal drug laboratories or their assessment and, therefore, would not be expected to possess the necessary skills needed to identify signs of manufacturing methods. This observations is supported by the gross incompetence exhibited by the consultant on this project including his failure to comply with State regulations as required. To our knowledge, the only certified instructors currently in Colorado, are those consultants who were themselves had no specialized knowledge of illegal drug laboratories and were performing illegal and invalid assessments, and were granted State certification as special favors by Ms. Brisnehan, in violation of State regulations. It is apparent from the technically incompetent work by this consultant that he was trained by one of those instructors.

Violation of § 4.7 (5 violations)

According to mandatory State regulations, the consultant is required to perform specific tasks including:

4.7 Identification and documentation of areas of contamination. This identification may be based on visual observation, law enforcement reports, proximity to chemical storage areas, waste disposal areas, cooking areas, use areas, or the professional judgment of the Consultant.

On November 10, 2016, FACTs issued a report for the property wherein we identified contamination in the following five areas at a methamphetamine contamination levels of 0.53 µg/100cm²:

Hallway top of door bell cover
Kitchen, top of ceiling fan
bathroom ceiling fan
Master bathroom light fixture
NE Bedroom, north window blind

⁸ See for example: 769 Cleveland Cir, Lafayette, CO (2/10/2015) Documenting 189 violations. Audit available from: http://forensic-applications.com/meth/Boatman_Cleveland_PA_RA.pdf

⁹ A detailed description of the illegal activities can be found here: http://www.forensic-applications.com/meth/FEI_Tennyson_SA_CA_RA.pdf



Therefore, a legitimately trained, ethical Industrial Hygienist operating within the Code of Ethics of the American Board of Industrial Hygiene would have known that one of the following statements must necessarily be true:

1. One of the areas contained 2.65 µg/100cm²
2. All of the area contained 0.53 µg/100cm²
3. Surface contamination between these two limits must be present on the identified surfaces

FEI failed to identify these areas as required by regulations. Furthermore, according to mandatory State regulations, the consultant is required to assume that unless sampling is conducted in accordance with the clearance level sampling protocols of Section 6 and that sampling demonstrates the absence of such contamination in a given room, attic, crawl space, or ventilation system, then all rooms, attics, crawl spaces, and forced air ventilation systems of all buildings on the subject property must be assumed to be contaminated above the cleanup standards of Section 7. The actual language found in State Regulations is as follows:

4.7 ...In the case of single-family dwellings, all rooms, attics, crawl spaces, and forced air ventilation systems of all buildings on the subject property **must** be assumed to be contaminated above the cleanup standards of Section 7, unless sampling conducted in accordance with the clearance level sampling protocols of Section 6 demonstrates the absence of such contamination in a given room, attic, crawl space, or ventilation system. The Consultant may determine that assessment level sampling is appropriate to verify the presence of contamination in a given room to assist in selecting an appropriate decontamination strategy. If the Consultant determines that assessment sampling is appropriate, such sample collection and analysis shall be conducted in accordance with the assessment level sampling protocols and other requirements of Section 6 of this Part 1.

As discussed in this audit, the consultant merely invented his own “home-made” “do-it-yourself” sampling protocols and failed to conduct sampling in accordance with the clearance level sampling protocols of Section 6; therefore, all areas in the property must, by State regulations be assumed to be contaminated.

Violation of § 4.9

According to mandatory State regulations, the consultant is required to perform specific tasks including:

4.9 Identification and documentation of signs of contamination such as staining, etching, or fire damage.

As mentioned above, sampling had already identified areas of contamination and the consultant failed to identify those areas. Further, the consultant has no documented training or specialized knowledge in the assessment of illegal drug laboratories, and therefore, there is no information to indicate the consultant would possess the skills necessary to identify such signs. In the past¹⁰ FEI has similarly stated there no staining

¹⁰ See for example: 1170 Garrison Street, Lakewood, Colorado 80215: http://forensic-applications.com/meth/Censored_Compliance_Audit.pdf



even when overt staining was present in the property and even when that staining was mentioned in police reports.

In the following photographs, we have depicted heavily stained areas in other illegal drug laboratories wherein FEI has similarly failed to note indicative staining even though the staining was present and was actually photographed by FEI themselves:



**Photographs by FEI
Showing “No Staining” in Other Properties
that were Heavily Stained**





**Photographs by FEI
Showing “No Staining” in Other Properties
that were Heavily Stained**

Violation of § 4.10

According to mandatory State regulations, during the performance of a Preliminary Assessment, the consultant is required to perform specific tasks including:

4.10 Description of plumbing system, including identification and documentation of potential disposal into the sanitary sewer or an on-site wastewater treatment system (OWTS).

The consultant failed to provide the mandatory description and failed to provide any photographic documentation of the plumbing and merely used boilerplate language in their report stating:

All plumbing appeared to be in good condition.

Violation of §4.13

According to mandatory State regulations, during the performance of a Preliminary Assessment, the consultant is required to perform specific tasks including:

4.13 Identification of surfaces that are known or suspected to have been painted or sealed after the cessation of contamination-causing activities (painted-over surfaces).

Nowhere in the FEI report, has the consultant addressed this mandatory requirement. Instead, FEI merely stated:

The residence was relatively clean at the time of the PA and the walls and ceilings throughout the residence were recently painted.



Since FEI failed to follow the mandatory sampling protocols (as described later), their sampling failed to identify any contamination. Furthermore, in violation of regulations, as detailed later, FEI explicitly stated they used methanol to sample all painted surfaces.

Violation of §4.14

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties, including:

4.14 Photographic documentation of property conditions, including cooking areas, chemical storage areas, waste disposal areas, and areas of obvious contamination

In violation of §4.14, failed to provide photographs of those areas that were previously conclusively shown to be contaminated.

For example, on November 10th, 2016, FACTs issued a report which identified contamination in excess of the State cleanup level in the following locations:

Hallway top of door bell cover
Kitchen, top of ceiling fan
Bathroom ceiling fan
Master bathroom light fixture
NE Bedroom, north window blind

Violation of §4.15

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties, including:

4.15 If assessment sampling is conducted, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of assessment sampling shall include:

As documented below, FEI failed to comply with this section.

Violation of §4.15.1

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information, including:

4.15.1 a description of the sampling procedures used, including sample collection, handling, and QA/QC;

For this project, FEI appears to have merely inserted boiler-plate language, and never explains why the sampling procedures were in violation of so many aspect of regulations.

For example, in their report, FEI states:

All samples were collected using 2x2 inch polyester blend gauze pads.



However, this is exactly the same claim FEI has falsely made in the past, when they have not used 2x2 inch polyester blend gauze pads. For example, in three previous reports^{11,12,13} FEI falsely claimed:

All samples were collected using 2x2 inch polyester blend gauze pads.

However, personnel from FACTs (Connell) personally inspected the sampling materials used by FEI on the referenced project and found that FEI simply lied in their report and the sampling material used on the project was not 2x2 inch polyester blend gauze pads as claimed. In reality, in the past where FEI has claimed to use 2x2 inch polyester blend gauze pads, they have actually employed an isopropyl impregnated blended rayon-polypropylene prep pads that measure approximately 1”X1”.

Since FEI has an extended history of falsifying the information in its reports and falsely claiming to have used appropriate sampling materials, there is no reason to believe that for this project, they have actually used the correct materials. Furthermore, FEI has not provided any documentation that would support their claim.

Furthermore, in their report, FEI claims they used two different solvents, methanol and isopropanol, and yet, in violation of the regulations, nowhere in the report, has FEI explained which of their QA/QC blanks were methanol and which were isopropanol. Instead, we see the following conflicting information:

FEI collected twenty (21) samples and two (3) field blanks for this Preliminary Assessment.

We believe that if one looks at the laboratory chromatograms, one will probably find that FEI did not use two solvents at all, but falsified the report and used a single solvent for the entire project. FACTs will withdraw this allegation if we are provided with the original chromatograms, and we find the information is incorrect.

Although FEI falsely claims to have handled the samples as required, we do objectively know the samples were not handled as required; and we have addressed these problems in Section 6.2.14 later in this review.

¹¹ SCREENING LEVEL ASSESSMENT REPORT, Property Location 4383 Tennyson Street, Unit 3A Denver, Colorado 80212 Prepared For Ed McCue 4383 Tennyson Street, Unit 1A Denver, CO 80212 Prepared By Foothills Environmental, Inc. 1320 Simms Street, Suite 102 Golden, CO 80401 January 12, 2015

¹² COMMON AREA ASSESSMENT REPORT Property Location, 4383 Tennyson Street, Denver, Colorado 80212, Prepared For Gablehouse Granberg, LLC, C/O Berkeley Park Home Owner’s Association, 4383 Tennyson Street, Denver, CO 80212, Prepared By, Foothills Environmental, Inc., 1320 Simms Street, Suite 102, Golden, CO 80401, January 25, 2015

¹³ METHAMPHETAMINE POST REMEDIATION ASSESSMENT, Prepared for: Ed & Ann McCue 4383 Tennyson Street, Unit 1A Denver, CO 80212 Project Location: 4383 Tennyson Street, Unit 3A Denver, CO 80212 Report Date: April 21, 2015 Foothills Environmental Project Number: ME15003



Violation of §4.15.2 (2 violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information, including:

4.15.2 documentation of the analytical methods used and laboratory QA/QC requirements, including the laboratory analytical report and chain-of-custody documentation; and

The analyzing laboratory states:

Fortes Laboratories is using a modified NIOSH (National Institute of Occupational Safety and Health) method 9109 from the NIOSH Manual of Analytical Methods (NMAM) Fifth Edition, and EPA method 1694 for LC/MS analysis of methamphetamine on wipes.

The NIOSH 9109 Method is a gas chromatography/mass spectrometry (GCMS) method but the EPA 1694 method is entirely different; it is a high performance liquid chromatography method combined with mass spectrometry – mass spectrometry (HPLC/MS/MS).

According to the FEI report:

The samples were analyzed by Gas Chromatography Mass Spectrometry (GC/MS).

But the laboratory disagrees and seems to think the samples were analyzed by liquid chromatography mass spectrometry. Which is it?

The identified method, (EPA 1694) is titled “*Method 1694: Pharmaceuticals and Personal Care Products in Water, Soil, Sediment, and Biosolids by HPLC/MS/MS*” and Table 1 of that method identifies the analytes for which the method was intended. Methamphetamine does not appear on that list, and is not mentioned anywhere in the method. Furthermore, “wipes” are not identified anywhere in the method. This is not a problem with the laboratory, since the laboratory is at liberty to do whatever it wants to do and does not have to follow Colorado Regulations – rather this is a violation by FEI who was required by regulations to ensure the selected laboratory was using an appropriate method, and then to describe the QA/QC employed. FEI failed to meet this regulatory obligation.

As described in Section 6.2.14 of this review, the chain-of-custody did not meet regulatory requirements.

Violation of §4.15.3 (10 violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information, including:

4.15.3 results of sampling, including a description of sample locations and a computer generated figure illustrating the layout of the building(s) and sample locations and identification. Sample results shall be presented as reported by the analytical laboratory, and shall not be adjusted, changed, or manipulated in any way. Spiked samples

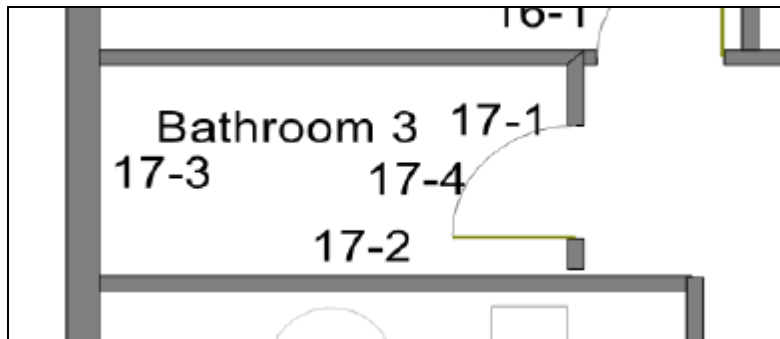


submitted for analysis shall not be used for purposes of compliance with these regulations.

Based on the report, FACTs has identified the following violations:

4.15.3 results of sampling, including a description of sample locations...

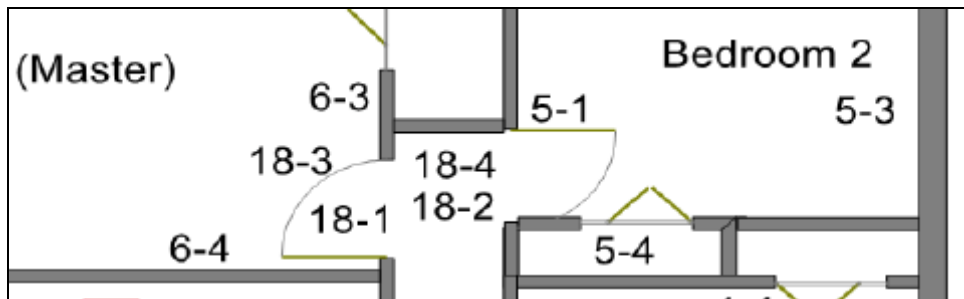
In their report, FEI claims that Sample 17 was a four aliquot sample (17-1 through 17-4) collected from a basement Bathroom (bathroom 3) and was a 400 cm² sample. (See drawing below):



However, in the report, FEI also claims that Sample 17 was actually a single 100 cm² aliquot collected from an heat exchanger (see below):

17	Basement Bathroom 3 - heat exchange chamber	100 cm ²	<0.02 µg/100 cm ²
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Similarly, in the report, FEI indicates Sample 18 was collected in the hallway and Master Bedroom (see below).



FEI also indicates the sample was actually collected from the attic (although there are no drawings of the attic samples as required) – See below:

18	Attic – rafter, ceiling, vent, frame (limited access)	400 cm ²	<0.02 µg/100 cm ²
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Therefore, eight sample aliquots (or five depending on which statement in the FEI report is correct) have conflicting sample location descriptions.



FEI was required to provide:

4.15.3... a computer generated figure illustrating the layout of the building(s) and sample locations and identification.

There was no figure illustrating the locations of the four attic sample aliquot (indeed, there was no figure illustrating the layout of the attic as required).

There is no figure showing the location of Sample 6-1.

FEI was required to provide:

4.15.3 ... Sample results shall be presented as reported by the analytical laboratory, and shall not be adjusted, changed, or manipulated in any way.

FEI has altered the laboratory report for Sample 17. According to the laboratory report, Sample 17 is a 400 cm² aliquot from Bathroom 3 (also note that although FEI claims the sample was analyzed by gas chromatography/mass spectrometry (GCMS) the laboratory claims the sample was analyzed by liquid chromatography mass spectrometry (LCMS):

17	Basement Bathroom 3	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
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According to FEI, the same sample is a single 100 cm² discrete sample from the heat exchanger in Bathroom three.

17	Basement Bathroom 3 - heat exchange chamber	100 cm ²	<0.02 µg/100 cm ²
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Violation of §4.16 (8 Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.16 Documentation of personal property assessment and discussion of items that require decontamination or disposal, and items that can be released to the owner because the Consultant has determined, in accordance with Section 5.11.1.4 of this Part 1, that they are not contaminated.

According to FEI:

The residence was unoccupied at the time of this Preliminary Assessment and did not contain any furniture or salvageable personal property.

However, according to Ms. Brisnehan with the CDPHE, window blinds are considered “personal property” and Ms. Brisnehan has stated in writing that the regulations require blinds to be treated as such. According to Ms. Brisnehan, FEI was required to identify window blinds as “personal property.” Throughout the structure, FEI photographed several rooms with window blinds and entirely failed to identify those items (and sample those items as required). See the FEI photographs below:





FEI Photographs
Documenting Personal Belongings

Violation of §4.17

During the performance of a Preliminary Assessment if the consultant performs clearance sampling, such sampling must be performed pursuant to specific requirements:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1.

FEI specifically identified their report thusly:

CLEARANCE ASSESSMENT REPORT

Therefore, one may assume FEI was aware of the fact they were performing clearance sampling and were, therefore, required to comply with Section 6 of Part 1. Similarly, according to §4.17, the consultant is required to provide specific information:

4.17 ... Documentation of clearance sampling shall include:

Violation of §4.17.1

During the performance of a Clearance Sampling the consultant is required to provide specific documentation:



4.17.1 A description of the sampling procedures used, including sample collection, handling, and QA/QC.

For this project, FEI appears to have merely inserted boiler-plate language, and never explains why the sampling procedures were in violation of so many aspect of regulations.

For example, in their report, FEI states:

All samples were collected using 2x2 inch polyester blend gauze pads.

However, this is exactly the same claim FEI has falsely made in the past, when they have not used 2x2 inch polyester blend gauze pads. For example, in three previous reports^{14,15,16} FEI falsely claimed:

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However, personnel from FACTs (Connell) personally inspected the sampling materials used by FEI on the referenced project and found that FEI simply lied in their report and the sampling material used on the project was not 2x2 inch polyester blend gauze pads as claimed. In reality, in the past where FEI has claimed to use 2x2 inch polyester blend gauze pads, they have actually employed an isopropyl impregnated blended rayon-polypropylene prep pads that measure approximately 1 inch by 1 inch.

Since FEI has an extended history of falsifying the information in its reports and falsely claiming to have used appropriate sampling materials, there is no reason to believe that for this project, they have actually used the correct materials. Furthermore, FEI has not provided any documentation that would support their claim.

Furthermore, in their report, FEI claims they used two different solvents, methanol and isopropanol, and yet, in violation of the regulations, nowhere in the report, has FEI explained which of their QA/QC blanks were methanol and which were isopropanol. Instead, we see the following conflicting information:

FEI collected twenty (21) samples and two (3) field blanks for this Preliminary Assessment.

¹⁴ SCREENING LEVEL ASSESSMENT REPORT, Property Location 4383 Tennyson Street, Unit 3A Denver, Colorado 80212 Prepared For Ed McCue 4383 Tennyson Street, Unit 1A Denver, CO 80212 Prepared By Foothills Environmental, Inc. 1320 Simms Street, Suite 102 Golden, CO 80401 January 12, 2015

¹⁵ COMMON AREA ASSESSMENT REPORT Property Location, 4383 Tennyson Street, Denver, Colorado 80212, Prepared For Gablehouse Granberg, LLC, C/O Berkeley Park Home Owner's Association, 4383 Tennyson Street, Denver, CO 80212, Prepared By, Foothills Environmental, Inc., 1320 Simms Street, Suite 102, Golden, CO 80401, January 25, 2015

¹⁶ METHAMPHETAMINE POST REMEDIATION ASSESSMENT, Prepared for: Ed & Ann McCue 4383 Tennyson Street, Unit 1A Denver, CO 80212 Project Location: 4383 Tennyson Street, Unit 3A Denver, CO 80212 Report Date: April 21, 2015 Foothills Environmental Project Number: ME15003



We believe that if one looks at the laboratory chromatograms, one will probably find that FEI did not use two solvents at all, but falsified the report and used a single solvent for the entire project. FACTs will withdraw this allegation if we are provided with the original chromatograms, and we find the information is incorrect.

Although FEI falsely claims to have handled the samples as required, we do objectively know the samples were not handled as required; and we have addressed these problems in Section 6.2.14 later in this review.

Violation of §4.17.2 (2 violations)

During the performance of a Clearance Sampling, the Consultant is required by regulations to provide specific information, including:

4.17.2 Documentation of the analytical methods used and laboratory QA/QC documentation, including the laboratory analytical report and chain-of-custody documentation.

In the FEI report, the analyzing laboratory states:

Fortes Laboratories is using a modified NIOSH (National Institute of Occupational Safety and Health) method 9109 from the NIOSH Manual of Analytical Methods (NMAM) Fifth Edition, and EPA method 1694 for LC/MS analysis of methamphetamine on wipes.
--

The NIOSH 9109 Method is a gas chromatography/mass spectrometry (GCMS) method but the EPA 1694 method is entirely different; it is a high performance liquid chromatography method combined with mass spectrometry – mass spectrometry (HPLC/MS/MS).

According to the FEI report:

The samples were analyzed by Gas Chromatography Mass Spectrometry (GC/MS).

But the laboratory disagrees and seems to think the samples were analyzed by liquid chromatography mass spectrometry. Which is it?

The identified method, (EPA 1694) is titled “*Method 1694: Pharmaceuticals and Personal Care Products in Water, Soil, Sediment, and Biosolids by HPLC/MS/MS*” and Table 1 of that method identifies the analytes for which the method was intended. Methamphetamine does not appear on that list, and is not mentioned anywhere in the method. Furthermore, “wipes” are not identified anywhere in the method. This is not a problem with the laboratory, since the laboratory is at liberty to do whatever it wants to do and does not have to follow Colorado Regulations – rather this is a violation by FEI who was required by regulations to ensure the selected laboratory was using an appropriate method, and then to describe the QA/QC employed. FEI failed to meet this regulatory obligation.



As described in Section 6.2.14 of this review, the chain-of-custody did not meet regulatory requirements.

Violation of §4.17.3 (10 violations)

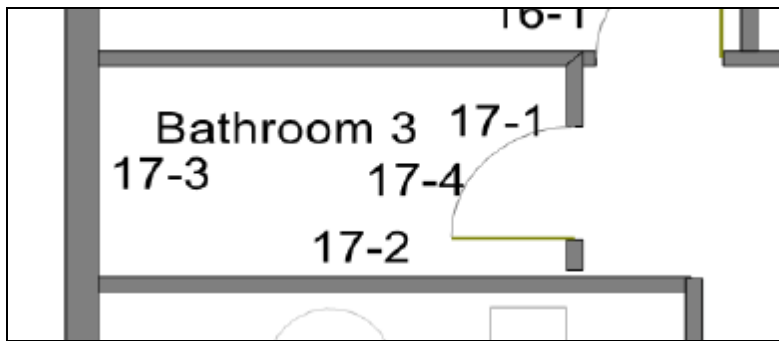
During the performance of a Clearance Sampling, the Consultant is required by regulations to provide specific information, including:

4.17.3 Results of clearance sampling, including a description of sample locations and a computer generated figure with sample locations and identification, and a copy of each laboratory report of sample results. Sample results shall be presented as reported by the analytical laboratory, and shall not be adjusted, changed, or manipulated in any way.

Based on the report, FACTs has identified the following violations:

4.17.3 Results of clearance sampling, including a description of sample locations...

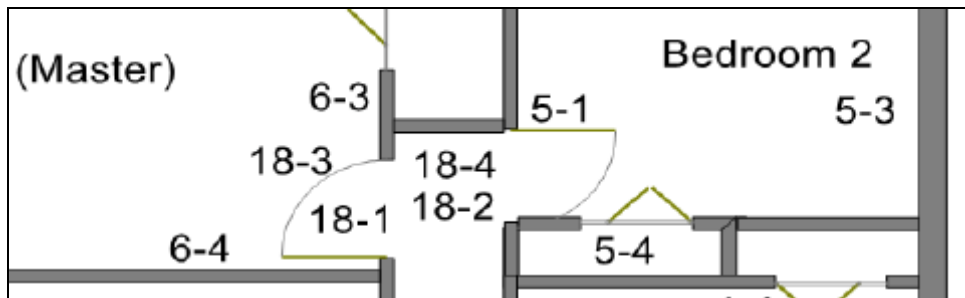
In their report, FEI claims that Sample 17 was a four aliquot sample (17-1 through 17-4) collected from a basement Bathroom (bathroom 3) and was a 400 cm² sample. (See drawing below):



However, in the report, FEI also claims that Sample 17 was actually a single 100 cm² aliquot collected from an heat exchanger (see below)

17	Basement Bathroom 3 - heat exchange chamber	100 cm ²	<0.02 µg/100 cm ²
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Similarly, in the report, FEI indicates Sample 18 was collected in the hallway and Master Bedroom (see below).



FEI also indicates the sample was actually collected from the attic (although there are no drawings of the attic samples as required) – See below:

18	Attic – rafter, ceiling, vent, frame (limited access)	400 cm ²	<0.02 µg/100 cm ²
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Therefore, eight sample aliquots (or five depending on which statement in the FEI report is correct) have conflicting sample location descriptions.

FEI was required to provide:

4.17.3... and a computer generated figure illustrating the layout of the building(s) and sample locations and identification.

There was no figure illustrating the locations of the four attic sample aliquot (indeed, there was no figure illustrating the layout of the attic as required).

There is no figure showing the location of Sample 6-1.

FEI was required to provide:

4.17.3 ... Sample results shall be presented as reported by the analytical laboratory, and shall not be adjusted, changed, or manipulated in any way.

FEI has altered the laboratory report for Sample 17. According to the laboratory report, Sample 17 is a 400 cm² aliquot from Bathroom 3 (also note that although FEI claims the sample was analyzed by gas chromatography/mass spectrometry (GCMS) the laboratory claims the sample was analyzed by liquid chromatography mass spectrometry (LCMS):

17	Basement Bathroom 3	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
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According to FEI, the same sample is a single 100 cm² discrete sample from the heat exchanger in Bathroom three.

17	Basement Bathroom 3 - heat exchange chamber	100 cm ²	<0.02 µg/100 cm ²
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Violation of §4.17.4

During the performance of a Clearance Sampling, the Consultant is required by regulations to provide specific information, including:

4.17.4 Documentation of variations from standard practices.

For this property, the consultant grossly deviated from standard practices as objectively demonstrated in this audit. However, FEI failed to mention any of the 407 regulatory violations (each a variation) as required, and knowingly, with the intent to deceive, falsely certified the work as compliant. The failure to identify each deviation would itself be a violation.



Violation of §4.19

During the performance of a Preliminary Assessment the consultant is required to provide specific mandatory certifications:

4.19 A certification statement, signed by the Consultant, in the following form:
"I hereby certify that I conducted a preliminary assessment of the subject property in accordance with 6 CCR 1014-3, Part 1, § 4."

FEI was fully aware of the fact they were attempting to perform a Preliminary Assessment at the property and explicitly stated such repeatedly in their report:

The residence was unoccupied at the time of this Preliminary Assessment and did not contain any furniture or salvageable personal property.

And:

This Preliminary Assessment was commissioned by the property owner based on a methamphetamine test performed by a non-qualified individual for a pending real estate transaction.

And:

The sampling for this Preliminary Assessment was conducted on November 14, 2016.

And:

The sampling was conducted in accordance with 6 CCR 1014-3, Part 1. FEI collected twenty (21) samples and two (3) field blanks for this Preliminary Assessment.

Yet, nowhere in the FEI report does the mandatory certification as required by §4.19 exist.

Violations of §6

During the performance of a Clearance Sampling the consultant is required to perform specific mandatory actions:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1.

FEI specifically identified their report thusly:

CLEARANCE ASSESSMENT REPORT

Therefore, one may assume FEI was aware of the fact they were performing clearance sampling and were, therefore, required to comply with Section 6 of Part 1. Similarly, according to §4.17, the consultant is required to provide specific information:

Violation of §6.1.3

During the performance of a Clearance Sampling, the Consultant is required by regulations to provide specific information, including:



6.1.3 The following sample collection procedures shall be followed for screening level sampling, preliminary assessment sampling and clearance sampling, except as provided in Section 6.8.2 of this Part 1.

Violation of §6.1.3.2

During the performance of a Clearance Sampling, the Consultant is required by regulations to perform specific sampling including:

6.1.3.2. Wipe sampling shall be used to determine the extent of lead contamination on all surfaces at properties whenever the preliminary assessment indicates the phenyl-2-propanone (P2P) method of methamphetamine manufacture was used on the property.

There is nothing to indicate the consultant in question (Mr. Ronald Crandall) has ever received any training in, or possesses any legitimate specialized knowledge of, clandestine drug laboratories. Therefore, there is nothing in the documentation that would suggest Mr. Crandall would possess the competency to even be able to identify a P2P laboratory. Currently, State Certifications authoring consultants to perform regulatory work are not issued based on the consultant's proficiency, but rather are issued as personal favors by Ms. Brisnehan in violation of regulations. Indeed, the gross incompetence exhibited by Mr. Crandall on this project, as evidenced by 408 violations, demonstrated the lack of competency to perform the work in the first place.

Violation of §6.1.3.3

During the performance of a Clearance Sampling, the Consultant is required by regulations to perform specific sampling including:

6.1.3.3 Wipe sampling shall be used to determine the extent of iodine contamination whenever there is visible evidence of iodine staining on surfaces that will not be removed.

We know from other projects where iodine contamination was identified, FEI entirely failed to comply with the regulations regarding iodine sampling. For example, in March of 2009, FEI prepared an invalid "*Preliminary Assesment (sic) For Methamphetamine Contamination*"¹⁷ for a property located at 1170 Garrison Street Lakewood, Colorado 80215. The property had staining consistent with iodine staining:

¹⁷ See for example: PRELIMINARY ASSESSEMENT (sic) FOR METHAMPHETAMINE CONTAMINATION Property Location: 1170 Garrison Street, Lakewood, CO, Prepared By Foothills Environmental, Inc. 1320 Simms Street, Suite 102, Golden, CO 80401 March 9, 2009





**Photograph of Iodine Staining at
1170 Garrison Street Lakewood, Colorado 80215¹⁸**

In fact, in that report, FEI even admitted that law enforcement personnel also noted the staining:

The South Metro Drug Task Force (SMDTF) investigated the property on November 26th, 2006. The report mentions the observation of visual staining and odors associated with Methamphetamine manufacturing.

Yet in spite of the overt, prominent, and patently obvious staining in the residence, FEI simply lied in their report and claimed:

All sampling was conducted following protocols outlined by the Colorado Department of Public Health and Environment (CDPHE) 6 CCR 1014-8 Regulations. FEI did not observe staining inside the residence.

Remarkably, FEI then went on to photograph the stains they claimed didn't exist.

For this property, FEI entirely failed to address the iodine issue at all and interior staining was only mentioned in the context of kitchen and bathroom sinks.

¹⁸ FACTs, Inc. photograph Jan 8, 2009.



The bathroom and kitchen sinks did not exhibit signs of chemical staining or etching.

It would appear that Mr. Crandall so lacked any training or competency in the assessment of drug laboratories that he was not aware of the fact that most of the staining associated with drug laboratories would not be in the sinks.

There is nothing to indicate the consultant in question (Mr. Ronald Crandall) has ever received any training in, or possesses any legitimate specialized knowledge of, clandestine drug laboratories. Therefore, there is nothing in the documentation that would suggest Mr. Crandall would possess the competency to even be able to identify an iodine contaminated laboratory.

Therefore, for this property, given the historically falsified FEI documents, and the large number of regulatory violations for this property, there is simply no confidence that iodine contamination is not present. Until such time that a lawful, valid Preliminary Assessment is performed at the property as required by regulations, the issue of iodine contamination will remain unknown.

Violation of §6.1.3.5

During the performance of a Clearance Sampling, the Consultant is required by regulations to perform specific sampling including:

6.1.3.5 Vapor sampling shall be used to determine the extent of mercury contamination whenever the preliminary assessment indicates the P2P method of methamphetamine manufacture was used on the property.

As already discussed, there is nothing to indicate the consultant Mr. Crandall, has ever received any training in, or possesses any legitimate specialized knowledge of, clandestine drug laboratories. Therefore, there is nothing in the documentation that would suggest Mr. Crandall would possess the competency to even be able to identify a P2P laboratory. Indeed, the gross incompetence exhibited by Mr. Crandall on this project, as evidenced by 408 violations, demonstrated the lack of competency to perform the work in the first place.

Violation of §6.2.1 (81 violations)

According to the Regulations, when wipe samples are collected, the consultant is required to use specific sampling materials including:

6.2.1 Sample media shall consist of 2x2 inch wipes made of one of the following:

6.2.1.1 Cotton gauze material.

6.2.1.2 4-ply non-woven cotton/polyester blend.

6.2.1.3 Tightly knitted continuous filament polyester.

In the report FEI stated:



All samples were collected using 2x2 inch polyester blend gauze pads.

Public documentation has demonstrated that FEI has made this very claim when the sampling media is not 2x2 inch polyester gauze pads. For example, Foothills Environmental, Inc. performed an invalid screening assessment at a property located at 4383 Tennyson Street, Denver, CO 80212, for which there were no fewer than 343 regulatory violations.¹⁹ In the Tennyson Street property, FEI also stated:

All samples were collected using 2x2 inch polyester blend gauze pads.

This reviewer, Mr. C.P. Connell, personally inspected the sampling materials used by FEI on that project and personally, based on firsthand knowledge, observed that the sampling media was not compliant with regulations, was not 2X2 pads as falsely claimed, and was not a polyester blend and was not a tightly knitted continuous filament polyester. Since, as described below, Mr. Crandall failed to comply with mandatory sample submittal information which was supposed to include matrix information, there is nothing in the documentation to indicate Mr. Crandall actually did anything other than use the usual FEI pads which in the past have been *circa* one square inch isopropyl impregnated blended rayon-polypropylene prep pads and then simply falsified his report.

In the current FEI report, Mr. Crandall provides conflicting information on the number of samples/aliquots actually collected at the property:

FEI collected twenty (21) samples and two (3) field blanks for this Preliminary Assessment. All twenty-one (21) samples...

And also in their report, FEI claims that Sample 17 was a four part sample (17-1 through 17-4) but also claims Sample 17 was a single 100 cm² aliquot sample.

Therefore, since Mr. Crandall could not even competently identify the number of samples he collected from the property it is difficult to know exactly how many violations of this provision exist. However, since FEI claims that it collected 81 samples/aliquots, there would be 81 violations of regulation.

Violation of §6.2.2

According to the Regulations, when wipe samples are collected, the consultant is required to use specific sampling protocols including:

6.2.2 Delineate a 100 cm² area on the surface to be sampled, either by attaching a physical template to the surface (being careful not to touch the area within the template), or by an equivalently reliable and accurate method. The area within the template (i.e., the sample area) shall be 100 cm². **Physical templates may not be re-used.**

¹⁹ See for example the following audit found here: http://www.forensic-applications.com/meth/FEI_Tennyson_SA_CA_RA.pdf





FEI Photograph

The above photograph, taken by FEI necessarily indicates one of two conditions:

- 1) The template was reused for Sample 2-1 and Sample 2-2, or,
- 2) One of the sample identifiers must be incorrect.

Either way, the issue was not resolved, or even discussed as required, in the FEI report.

Failure to comply with §6.2.3

According to the Regulations, when wipe samples are collected, the consultant is required to perform specific tasks:

6.2.3 Prepare a rough sketch of the area(s) to be sampled and indicate sample location(s).

FACTs did not observe a rough sketch in the documentation.

Failure to comply with §6.2.4 (55 violations)

According to the Regulations, when wipe samples are collected, the consultant is required to perform specific tasks:

6.2.4 Wet the sample media with isopropanol to enhance collection efficiency.

In the FEI report, Mr. Crandall explicitly states:

For painted over surfaces, the gauze pads were dampened with methanol to

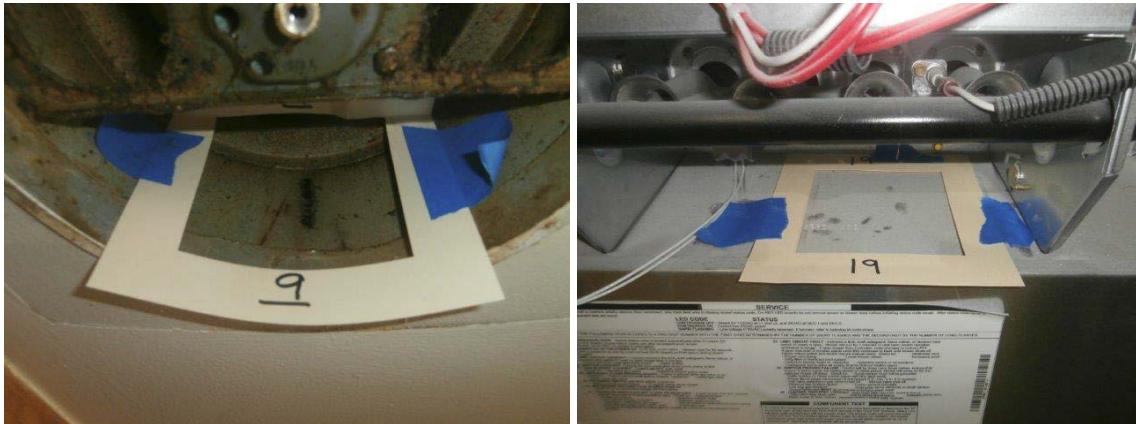


enhance collection efficiency in accordance with 6 CCR 1014-3 Part 1, Section 6.2.15.

This indicates that Mr. Crandall has entirely failed to understand the regulations, and therefore failed to comply with the sampling requirements. According to the regulations, methanol may only be used for “painted-over surfaces” which is explicitly defined as:

“Painted-over surface” means a surface that was painted after the cessation of contamination-causing activities but prior to the discovery of a methamphetamine-affected property.

Nowhere in the FEI report, has FEI made any attempt to determine which surfaces were “painted over surfaces” and which surfaces were merely painted surfaces. Mr. Crandall has merely invented his own regulatory sampling protocol wherein any painted surface was sampled with methanol as the solvent and non-painted surfaces were sampled with isopropyl as the solvent. Indeed, this conclusion is supported by Mr. Crandall himself who provided several photographs of a painted surfaces that clearly had not been recently painted, and yet, in violation of the regulations, were sampled using methanol:



FEI Photographs of Old Painted Surfaces
Sampled with Methanol





FEI Photographs of Old Painted Surfaces
Sampled with Methanol

Since, in violation of regulations, there is nothing to indicate that any of the painted surfaces were “painted-over surfaces” (i.e. surfaces that had been painted after the cessation of contamination causing activities), none of the samples collected with methanol can be used for regulatory clearance purposes. Based on the information in the FEI report, there were at least 55 such sample surfaces, therefore, there are at least 55 violations of this provision.

Violation of §6.2.6 (8 Violations)

During the performance of sample collection, the Consultant is required to collect samples using mandatory and specified methodologies. Including:

6.2.6 Blot rough surfaces uniformly instead of wiping. Wipe smooth surfaces as described in the next section below.

The FEI report documented the collection of several samples from rough surfaces:





FEI Photographs of Rough Surfaces
Unlawfully Sampled Using Wipe Methods

And yet, in their report, FEI openly admits they willfully ignored Section 6.2. and with willful disregard for the regulations, FEI states:

For non-painted surfaces, the gauze pads were dampened using isopropanol to enhance collection efficiency and collected in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.

The referenced rubrics FEI admits it followed do not apply to rough surfaces and cannot be used for rough surfaces. The samples collected from these surfaces are invalid.

Violation of §6.2.7 (76 Violations)

During the performance of a Preliminary Assessment, if the Consultant collects clearance samples, they must be collected pursuant to specific protocols:

6.2.7 Wipe the surface using one of the following methods:

6.2.7.1 Square method: Start at the outside edge and progress toward the center of the surface area by wiping in concentric squares of decreasing size.

6.2.7.2 “S” method: Wipe horizontally from side-to-side in an overlapping “S”-like pattern as necessary to completely cover the entire wipe area.



6.2.8 Without allowing the sample media to come into contact with any other surface, fold the sample media with the sampled side in.

6.2.9 Use the same sample media to repeat the sampling of the same area using the same method. If using the “S” method, the second pass shall be sampled by wiping with overlapping “S”-like motions in a top-to-bottom direction.

6.2.10 Fold sampled side in. Using the same sample media, sample the same area a third time. The third pass shall be sampled by wiping using the method not previously used (i.e., use the square method if the “S” method was originally used).

6.2.11 Fold the sample media over again so that the sampled side is folded in. Place the sample media in a sample container, cap and number it, and note the number at the sample location on the sketch. Remove and discard impervious gloves. Include notes with the sketch giving any further description of the sample, including sample name and time of collection. Photograph each sample location.

As described above, FEI claims it used this method for all samples, even where such wiping is specifically prohibited by regulations. In truth, historically, FEI merely makes this claim knowing the claim to be false.

For this property located at Uinta, FEI claims:

For non-painted surfaces, the gauze pads were dampened using isopropanol to enhance collection efficiency and collected in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.

In previous audits, FACTs has objectively demonstrated that FEI regularly claims to have complied with regulations while at the same time, knowingly, with the intent to defraud their client, violated those regulations and falsely certified their methods.

In general, in the past, FEI has claimed to have performed the mandatory three-pass pattern even when it FEI then inadvertently admitted only one pass was used, and it would have been a physical impossibility to comply with the regulations.

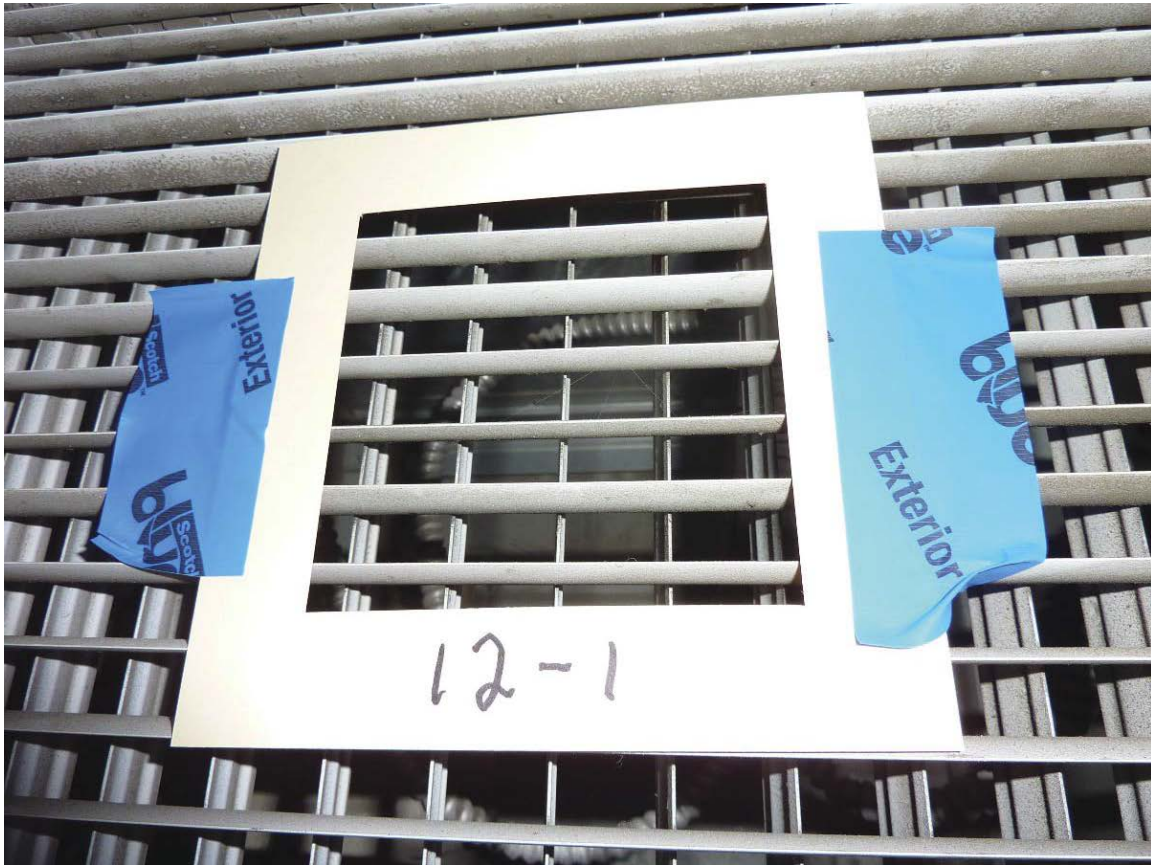
For example, in the case of 4383 Tennyson Street Denver, Colorado 80212 (wherein FEI committed 343 regulatory violations²⁰) FEI similarly made the following statement:

The gauze pads were dampened using isopropanol to enhance collection efficiency. The “S” method was used to collect the samples in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.

Yet, when we look at the actual sample surfaces, it would have been physically impossible to comply with Section 6.2.7 through 6.2.11. For example, at the Tennyson Street property where FEI also claimed to have followed Section 6.2.7 through 6.2.11, we see surfaces such as the one below:

²⁰ See for example the following audit found here: http://www.forensic-applications.com/meth/FEI_Tennyson_SA_CA_RA.pdf





FEI Photograph of Invalid Sample Collected From
4383 Tennyson Street Denver, Colorado 80212

For this sample, not only was the surface not 100 cm² as required, but it would be impossible to collect a sample from the surface “...in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.” Yet for that property, just like the Uintah property, FEI claimed to have followed the regulations. Since historically, FEI has knowingly, with the intent to commit fraud, falsified their reports, there is no confidence that for this property, they actually followed the provisions as claimed – especially given the fact that there were no fewer than 408 violations identified on this project. Certainly, and objectively, there is nothing in the documentation for the Uinta Street property to indicate that samples were collected “...in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.”

In any event, for the Uinta Street property, FACTs has objective, fact-based evidence that 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11 was not followed as follows – according to §6.2.11:

6.2.11 ...Include notes with the sketch giving any further description of the sample, including sample name and time of collection. Photograph each sample location.



For this project, conclusively, we objectively know that Mr. Crandall did not comply with §6.2.11 as claimed since nowhere in the documentation is the mandatory time of collection provided. At a minimum, we know that there were some 76 aliquots collected, therefore, there would be a minimum of 76 violations of this section, other sampling considerations notwithstanding.

Considering the historical falsifications and fabrications by this consultant, we believe the lack of documentation of compliance in the report is a strong argument for noncompliance. If there had been a single example anywhere in the State where FEI had had performed a lawful legitimate Preliminary Assessment, devoid of false statements, we would concede the possibility that perhaps the work on this property was compliant – however, to our knowledge no such compliant work has ever been performed by Mr. Crandall, Mr. Gonzalez or FEI.

Violation of §6.2.12.1 (4 violations)

During the performance of a Preliminary Assessment, if the Consultant collects samples they must be collected pursuant to specific protocols:

6.2.12 Submit at least one field blank, prepared and handled in the same fashion but without wiping, for every 10 samples collected, according to the following:

6.2.12.1 To collect a field blank, remove a wipe from the wrapper with a new glove, shake the wipe open, refold in the same manner as during the sampling procedure, and then insert the wipe into the sample container.

6.2.12.2 Repeat this procedure for multiple aliquots when collecting a composite field blank.

There are no photographs of the blank samples as required and therefore there is nothing to indicate that this mandatory procedure was used for the field blanks.

Violation of §6.2.12.4

During the performance of a Preliminary Assessment, if the Consultant collects samples they must be collected pursuant to specific protocols:

6.2.12.4 For projects with greater than 10 samples collected, sample 11 shall be a field blank, **every 10th subsequent sample shall be a field blank**, and the last sample of any sample group with fewer than 10 samples shall be a field blank.

For this project, Mr. Crandall inserted a field blank in the 11th position in the sequence, and, therefore, the next field blank was required to be the 21st sample. From the laboratory report, we see:

21	Cold Air Return (Dining Room)	Meth	LC/MS	Negative	100	0.0000	< 0.02 µg/100 cm ²
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This is further supported by the information by Mr. Crandall himself:

21	HVAC – Dining room cold air return	100 cm ²	<0.02 µg/100 cm ²
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Finally, Mr. Crandall stated that he used two different alcohols, but never specified for which alcohol the field blank represented.

Violation of §6.2.14

During the performance of a Preliminary Assessment, if the Consultant collects samples they must be handled pursuant to specific protocols and specific documentation must be included in the chain of custody:

6.2.14 Maintain a Chain-of-Custody Record covering the time of sample collection through final disposition. Document sample(s) collected from a single methamphetamine-affected property on one Chain-of-Custody Record. Every transfer of custody shall be noted and signed for and a copy of the record shall be kept by each individual who has signed it. Samples shall be sealed, labeled, and secured. All samples collected shall be transported directly to the laboratory. Shipping samples overnight is considered direct transport, and the shipping label shall be considered part of the Chain-of-Custody Record. Retain all sample documents for the project record and include them in the project reports. At a minimum, the Chain-of-Custody Record **shall** include the following:

Violation of §6.2.14.7 (24 Violations)

According to the regulations, FEI was required to provide the following information in the chain-of-custody:

6.2.14.7 number of containers for each sample;

The required information is missing for 24 samples, therefore, there are 24 violations of this provision.

Violation of §6.2.14.8 (24 Violations)

According to the regulations, FEI was required to provide the following information in the chain-of-custody:

6.2.14.8 sample collection time ...

The required information is missing for 24 samples, therefore, there are 24 violations of this provision.

Violation of §6.2.14.9 (24 Violations)

According to the regulations, Mr. Crandall was required to provide the following information in the chain-of-custody:

6.2.14.9 sample matrix;

The required information is missing for 24 samples, therefore, there are 24 violations of this provision. We believe that Mr. Crandall failed to provide this information since he



was aware he was using the incorrect solvent for sampling, and did not want to be caught out by the laboratory who, if they had been informed of a mix of alcohols, they would have noted there was only one alcohol used, and not two alcohols as claimed.

Violation of §6.2.14.11

According to the regulations, FEI was required to provide the following information in the chain-of-custody:

6.2.14.11 sample preservatives, if applicable; and

Nowhere on the chain of custody is the mandatory information given.

Violation of §6.2.14.12

According to the regulations, FEI was required to provide the following information in the chain-of-custody:

6.2.14.12 signature and date for each person relinquishing or receiving sample custody.

According to the chain of custody, the samples were shipped November 2, 2016:

Date Shipped 11/2/16 Carrier FedEx/UPS/USPS/Other
FED EX & UPS use this address:
Fortes Laboratories 25749 SW Canyon Creek Rd,
Suite #600, Wilsonville, Oregon 97070

However, Mr. Crandall claims the samples were relinquished by him on November 14, 2016. It is difficult to understand how the samples were shipped prior to being relinquished.

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
Ron Crandall <i>Ron Crandall</i>	11/14/16 17:00	<i>UPS</i>	

Furthermore, according to the chain-of-custody, UPS claim they did not receive the samples until November 15, 2016:

<i>UPS</i> Julian Steinbruggen	NOV 15 2016	<i>UPS</i> Julian Steinbruggen	NOV 15 2016
	NOV 15 2016	TEMPSTORE	NOV 15 2016

Nowhere in the report does Mr. Crandall identify to whom he gave his samples on November 14, 2016, and who then delivered the samples to the shipping organization.



Violation of §6.9.7 (6 violations)

According to the regulations, when a consultant performs clearance sampling, that sampling must comply with mandatory sampling protocols including:

6.9.7 The interior of major appliances (microwaves, refrigerators, freezers, ovens, and dryers) **must** be sampled using discrete samples. ...

As clearly documented in the photographs taken by Mr. Crandall, we can see that there were several major appliances in the property including a refrigerator, a freezer, an oven, a clothes washer and a clothes drier.



FEI Photographs of Major Appliances



According to the regulations, Mr. Crandall was required to sample those items as part of the clearance process and completely failed to even acknowledge their existence.

Based on the best information, Mr. Crandall failed to collect the following samples:

1. Interior of the kitchen oven as required
2. Interior of the refrigerator as required
3. Interior of the kitchen freezer as required
4. Interior of the clothes dyer as required
5. Interior of the washing machine as required
6. Interior of the dishwasher as required

Since Mr. Crandall himself took the above photographs, it would be impossible for him to claim that he didn't know the appliances were there. Therefore, one must conclude that he intentionally and willfully ignored the regulations and failed to comply with the requirements since he entirely failed to collect any samples from the major appliances as required.

Violation of Paragraph 6.9.7 (6 Violations – Appliances Exterior)

According to Ms. Colleen Brisnehan with the CDPHE, the regulation requires the consultant to collect samples from the *exterior* of the major appliances as well. The regulations state:

6.9.7 ...The exterior of major appliances may be sampled using composite samples.

Ms. Brisnehan has stated in writing that the regulations place a mandatory obligation and the consultant shall sample the exterior of the appliances.

Based on the best information, Mr. Crandall failed to collect the following samples:

1. Exterior of the kitchen oven as required
2. Exterior of the refrigerator as required
3. Exterior of the kitchen freezer as required
4. Exterior of the clothes dyer as required
5. Exterior of the washing machine as required
6. Exterior of the dishwasher as required

Violation of §6.9.11.1 (34 Violations)

During the performance of a Preliminary Assessment, if the Consultant collects clearance samples, they must be collected pursuant to specific protocols:

6.9.11 Locations of clearance samples shall be based on information gathered during the preliminary assessment. Samples shall be collected from surfaces that have a reasonable potential to contribute to human exposure, including:

6.9.11.1 Areas expected to have the **highest levels of contamination**, such as cooking areas, chemical storage areas, and waste disposal areas.



There is no indication the consultant for this project has ever received any legitimate training or possesses any specialized knowledge in the assessment of illegal drug laboratories. As such, it is not surprising that Mr. Crandall lacked the technical competence to collect samples in compliance with §6.9.11.1 and he collected samples from areas expected to have the **lowest** levels of contamination, such as interior mid-range walls.

In fact, of the all the non ventilation samples collected, only two samples (Sample 1-4 and Sample 13-4) could reasonably be argued to have come from a surface “...expected to have the **highest levels of contamination**,...”

Of the 36 aliquots that were required to be collected from areas expected to have the highest levels of contamination, 34 were collected from areas expected to have the **lowest** levels of contamination in violation of §6.9.11.1.

Violation of §6.12.1

According to the regulations, the analysis of samples must be conducted using specific methodologies:

6.12.1 Analysis of wipe samples, bulk samples, and vacuum samples for methamphetamine **shall** be conducted using one of the following methods:

6.12.1.1 NIOSH Method 9106, Methamphetamine and Illicit Drugs, Precursors and Adulterants on Wipes by Liquid-Liquid Extraction (Issue 1, October 17, 2011), or equivalent.

6.12.1.2 NIOSH Method 9109, Methamphetamine and Illicit Drugs, Precursors and Adulterants on Wipes by Solid Phase Extraction (Issue 1, October 17, 2011) or equivalent.

6.12.1.3 NIOSH Method 9111, Methamphetamine on Wipes by Liquid Chromatography/Mass Spectrometry (Issue 1, October 17, 2011), or equivalent.

6.12.1.4 Method 8270D in “Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846, or equivalent.

In the FEI report, the analyzing laboratory states:

Fortes Laboratories is using a modified NIOSH (National Institute of Occupational Safety and Health) method 9109 from the NIOSH Manual of Analytical Methods (NMAM) Fifth Edition, and EPA method 1694 for LC/MS analysis of methamphetamine on wipes.
--

The NIOSH 9109 Method is a gas chromatography/mass spectrometry (GCMS) method, but the EPA 1694 method is entirely different; it is a high performance liquid chromatography method combined with mass spectrometry – mass spectrometry (HPLC/MS/MS).

According to the laboratory used by FEI, the samples were analyzed using a LC/MS method, not a GC/MS method.



Sample	Location Sampled	Analysis	Method	Result	Area (cm ²)	Lab Result (µg/mL)	Area Converted Result
1	Kitchen	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
2	Living Room	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
3	Parlor	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
4	Bedroom 1 (East)	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²
5	Bedroom 2 (NE)	Meth	LC/MS	Negative	400	0.0000	< 0.02 µg/100 cm ²

That is, the laboratory used the EPA Method 1694 which is titled “*Method 1694: Pharmaceuticals and Personal Care Products in Water, Soil, Sediment, and Biosolids by HPLC/MS/MS*” and Table 1 of that method fails to identify methamphetamine as one of the analyte applicable to the method.

Furthermore, there is nothing in the FEI report that would indicate that the selected method is “equivalent” to the NIOSH Method 9111 which is also an LC/MS method.

Therefore, based on the available information, none of the samples were analyzed using a method that is acceptable pursuant to 6 CCR 1014-3, and none of the sample results can be used for compliance purposes.

VIOLATION OF THE AIHA/ABIH CODE OF ETHICS

It is also our opinion that the work performed by Mr. Crandall with Foothills Environmental constitute a violation of the Code of Ethics of the American Board of Industrial Hygienists and the American Industrial Hygiene Association and fails to meet a minimum standard of professional care. Specifically, it appears that Mr. Crandall has violated the following professional Codes of Ethics:

- Violation of ABIH (I)(A)(1)
- Violation of AIHA (I)(A)(1)
- Violation of ABIH (I)(A)(5)
- Violation of ABIH (I)(A)(6)
- Violation of AIHA (I)(A)(5)
- Violation of ABIH (II)(A)(1)
- Violation of AIHA (II)(A)(1)
- Violation of ABIH (II)(A)(2)
- Violation of AIHA (II)(A)(2)
- Violation of ABIH/AIHA (II)(A)(3)
- Violation of ABIH/AIHA (II)(A)(5)
- Violation of ABIH/AIHA (II)(A)(6)
- Violation of ABIH/AIHA (II)(C)(1)
- Violation of AIHA (II)(C)(2)

Violation of ABIH (I)(A)(1)

Comply with laws, regulations, policies and ethical standards governing professional practice of industrial hygiene and related activities.

As objectively documented in this audit, Mr. Crandall Failed to comply with Colorado State laws and regulations.



Violation of AIHA (I)(A)(1)

Comply with laws, regulations, policies, and ethical standards governing professional practice of industrial hygiene and related activities, including those of professional associations and credentialing organizations.

Clearly, as described above, Mr. Crandall failed to comply with the mandatory Colorado Regulations in the performance of this work.

Violation of ABIH (I)(A)(5)

Report apparent violations of the ethics code by certificants and candidates upon a reasonable and clear factual basis.

To our knowledge, Mr. Crandall has failed to report his violations to the ABIH and Mr. Gonzales has failed to report the violations to the ABIH.

Violation of ABIH (I)(A)(6)

Refrain from any public behavior that is clearly in violation of accepted professional, ethical or legal standards.

We believe the clearly deviant behavior of Mr. Crandall is a violation of accepted professional standards.

Violation of AIHA (I)(A)(5)

Refrain from any public behavior that is clearly in violation of accepted professional, ethical or legal standards.

Clearly, as described above, Mr. Crandall (and Mr. Gonzales) failed to refrain from public behavior that is in violation of the accepted professional and legal standards, by performing work in the public arena that appears to be in violation of environmental regulations and criminal statutes.

Violation of ABIH (II)(A)(1)

Deliver competent services with objective and independent professional judgment in decision-making.

As described in this review, Mr. Crandall failed to perform the necessary work in a competent manner.

Violation of ABIH (II)(A)(2)

Recognize the limitations of one's professional ability and provide services only when qualified. The certificant/candidate is responsible for determining the limits of his/her own professional abilities based on education, knowledge, skills, practice experience and other relevant considerations

It is our opinion that if Mr. Crandall had competence to practice in this area, there would not have been 408 violations of State regulations.



Violation of ABIH/AIHA (II)(A)(3)

Make a reasonable effort to provide appropriate professional referrals when unable to provide competent professional assistance.

Mr. Crandall failed to refer the work to a competent Industrial Hygienist.

Violation of ABIH/AIHA (II)(C)(1)

Follow appropriate health and safety procedures, in the course of performing professional duties, to protect clients, employers, employees and the public from conditions where injury and damage are reasonably foreseeable.

By performing grossly deficient work, as described above, one can reasonably foresee that any occupants of the property, Mr. Crandall's client, and the general public, are now placed at a higher risk of chemical and financial injury and damage due to his lack of technical competency.

Violation of AIHA (II)(C)(2)

Inform appropriate management representatives and/or governmental bodies of violations of legal and regulatory requirements when obligated or otherwise clearly appropriate.

Mr. Crandall has explicitly presented himself as familiar with State Regulation 6 CCR 1014-3. Therefore, Mr. Crandall must necessarily be aware of the fact that his work was in gross violation of those regulations. Therefore, Mr. Crandall had the professional obligation to bring his regulatory violations to the attention of the Governing Body with jurisdiction over this subject property. The public record does not contain any information to indicate that Mr. Crandall has reported his violations to anyone.

COLORADO CRIMINAL CODE – FRAUD; OFFERING A FALSE INSTRUMENT FOR RECORDING

According to Colorado Revised Statute §18-5-114 (*Offering a false instrument for recording*), a person commits a class 5 felony when offering a false instrument for recording in the first degree if, knowing that a written instrument relating to or affecting real or personal property or directly affecting contractual relationships contains a material false statement or material false information, and with intent to defraud, he presents or offers it to a public office or a public employee, with the knowledge or belief that it will be registered, filed, or recorded or become a part of the records of that public office or public employee.

Mr. Crandall represents that he is knowledgeable in the performance of the work and he has specifically and explicitly referenced 6 CCR 1014-3 and explicitly stated that he was aware of those requirements and that he complied with those requirements. FACTs has identified hundreds of similar regulatory violations in the past regarding the work of FEI, and therefore, one must conclude that Mr. Crandall was knowingly and willfully performing work that deviated from mandatory State requirements.



Pursuant to State statute and state regulations, the “Clearance Report” must be filed with the State of Colorado. Therefore, we believe the facts objectively establish that Mr. Crandall was aware of such recording and was aware of the false statements he made therein.

COLORADO CONSUMER PROTECTION ACT

In Colorado, consumers are protected against deceptive trade practices as delineated in the Colorado Consumer Protection Act, CRS Title 6, Article 1. According to those statutes, a person engages in a deceptive trade practice when, in the course of such person's business or occupation, that person knowingly makes a false representation as to the certification of their services, and/or knowingly makes a false representation as to the characteristics of their services and/or represents their services are of a particular standard, quality, or grade if he knows or should know that they are not as specified.

CONCLUSION

For this regulatory audit, FACTs has identified no fewer than 408 regulatory violations within the Preliminary Assessment and Final Clearance activities performed by Mr. Crandall with Foothills Environmental, Inc. for the property located at 3731 S. Uinta St. Denver, CO 80237.

Based on the totality of circumstances, compliance was not demonstrated and the property remains, by definition, a noncompliant illegal drug laboratory.



Appendix A

Reviewer's Statement of Qualifications





Forensic Applications Consulting Technologies, Inc. Consultant Statement of Qualifications

FACTs project name:	Uinta	Form # ML15
January 5, 2017		

Caoimhín P. Connell, has been involved in clandestine drug lab investigations and assessments since 2002 and meets the Colorado Revised Statute §24-30-1402 definition of an "Industrial Hygienist." He has been a practicing Industrial Hygienist since 1987. Mr. Connell is a recognized authority in drug-lab operations and is a Certified Instructor in Meth-Lab Safety through the Colorado Regional Community Policing Institute, CRCPI (Colorado Division of Criminal Justice) and was the lead instructor for the CRCPI through the Colorado Division of Criminal Justice, providing over 260 hours of methlab training for over 45 Colorado Law Enforcement Agencies, federal agents, probation and parole officers throughout Colorado judicial districts. He has provided meth-lab lectures to the US Interagency Board, US Air Force, the National Safety Council, and the American Industrial Hygiene Association (of which he is a member and served on the Clandestine Drug Lab Work Group and for whom he conducted the May, 2010, Clandestine Drug Lab Course, and is a coauthor of the AIHA methlab assessment publication.)

Mr. Connell is a member of the American Conference of Governmental Industrial Hygienists, the Occupational Hygiene Society of Ireland, the Colorado Drug Investigators Association, an appointed Member of the National Fire Protection Association, and the ASTM International Forensic Sciences Committee, (where he was the sole sponsor of the draft ASTM E50 *Standard for the Assessment of Suspected Clandestine Drug Laboratories*).

From 2009, Mr. Connell served as the Industrial Hygiene Subject Matter Expert on the Federally funded Interagency Board (Health, Medical, and Responder Safety SubGroup), and was elected full member of the IAB-HMRS in 2011 where he now serves. He is the only private consulting Industrial Hygienist in Colorado certified by the Office of National Drug Control Policy High Intensity Drug Trafficking Area Clandestine Drug Lab Safety Program, and P.O.S.T. certified by the Colorado Department of Law.

He has received over 194 hours of highly specialized law-enforcement sensitive training in drug lab operation, and under supervision of the US DEA, he has manufactured methamphetamine using a variety of street methods. He has received highly specialized drug lab assessment training through the Iowa National Guard, Midwest Counterdrug Training Center and the Florida National Guard Multijurisdictional Counterdrug Task Force, St. Petersburg College, Rocky Mountain HIDTA, as well as through the US NHTSA, and the U.S. Bureau of Justice Assistance (US Dept. of Justice) and he is currently ARIDE Certified.

Mr. Connell is a current sworn law enforcement officer who has conducted clandestine laboratory investigations and performed risk, contamination, hazard and exposure assessments from both the law enforcement (criminal) perspective, and from the civil perspective in residences, apartments, motor vehicles, and condominiums. Mr. Connell has conducted over 653 assessments of illegal drug labs in CO, SD, NE, OK, and collected over 6,140 samples during assessments (a partial detailed list of drug lab experience is available on the web at): <http://forensic-applications.com/meth/DrugLabExperience2.pdf>

He has extensive experience performing assessments pursuant to the Colorado meth-lab regulation, 6 CCR 1014-3, and was an original team member on two of the legislative working-groups which wrote the original regulations for the State of Colorado and he was the primary author of Appendix A (*Sampling Methods And Procedures*) and Attachment to Appendix A (*Sampling Methods and Procedures Sampling Theory*) of the original Colorado regulations. Mr. Connell strongly objected to the unscientific, unfounded and inappropriate amendments now found in regulation.

Recommended by the US NIOSH as Peer Review Expert for the NIOSH 9109 Method, *Methamphetamine*, he has been admitted as a drug lab expert in Colorado, and an Industrial Hygiene Expert in Colorado in both civil and criminal courts as well as Federal Court in Pennsylvania. He has provided expert testimony in several criminal cases including Grand Jury testimony and testimony for US Bureau ATF and he testified before the Colorado Board of Health and Colorado Legislature Judicial Committee regarding methlab issues. Mr. Connell has provided services to private consumers, Indian Nations, State Investigators, and Federal Investigators, and provided testimony regarding criminal activities of staff members at the Colorado Department of Public Health Environment.



Multijurisdictional Counterdrug Task Force Training

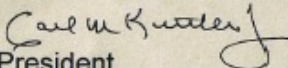


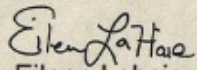
This is to certify that
Caoimhin P. Connell

Has satisfactorily completed the following 24 hour MCTFT training course held at
DIVIDE, CO

Rural Patrol

Training held 9/27/2004 through 9/29/2004


President
St. Petersburg College


Eileen Lahaie
MCTFT Director

A partnership between The Florida National Guard and St. Petersburg College

Midwest Counterdrug Training Center



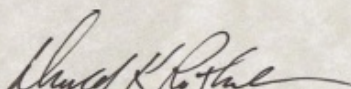
Certificate of Training

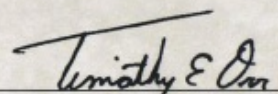
This certifies that

Caoimhin Connell

Has successfully completed the
Clandestine Laboratory Certification

Cheyenne, WY
40 Training Hours
2-6 August 2004


Network Environmental Systems, Inc.


LTC Timothy E. Orr
Commandant



Center *for* Task Force Training™

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED 20 HOURS OF TRAINING IN

METHAMPHETAMINE INVESTIGATION MANAGEMENT

MARCH 20-22, 2006

DENVER, COLORADO

Domingo S. Herraiz
Director, Bureau of Justice Assistance

Training coordinated by the
Institute for Intergovernmental
Research® on behalf of BJA



State and Local Anti-Terrorism Training

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED AN 8-HOUR
STATE AND LOCAL ANTI-TERRORISM TRAINING PROGRAM
NARCOTICS TASK FORCE ANTI-TERRORISM BRIEFING

June 1, 2006

Denver, Colorado

Domingo S. Herraiz
Director, Bureau of Justice Assistance



Training coordinated on behalf of BJA
by the Institute for Intergovernmental Research

*Rocky Mountain
High Intensity Drug Trafficking
Area*



Certifies that



Caoimhín Connell

has attended

4 hours of

Hash Oil Extraction: The Scene and The Patient

Aurora, CO

July 25, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA



www.nesglobal.net

Certificate of Completion

Caoimhin Connell

has successfully completed training in

Advanced Clan Labs: Beyond the Basics

presented by

NES, Inc.

1141 Sibley Street Folsom, CA 95630

Instructor - Brian Escamilla

04/28/14 04/30/14

Date

Contact Hours:24

This certifies that

Caoimhin P Connell

Has met the requirements for the online course

Expert Testimony Training for the Prosecutor and Scientist



11-07-2012

Certificate Number: 1109778763

For more information please visit <http://www.rti.org/forensiced>



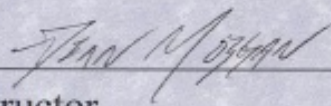
Park County Sheriff's Office Certificate of Completion

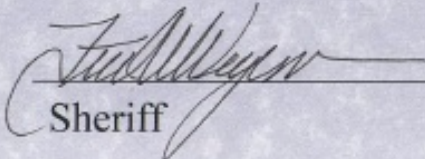
Caoimhin Connell

has completed an 8 hour course in:

Crime-scene Approach and Evidence Collection

Completed this 29th day of April, 2009


Instructor


Sheriff

***Rocky Mountain
High Intensity Drug Trafficking
Area***



Certifies that



Caoimhín P. Connell

*has attended
2 hours of
Hash Oil Explosions
Woodland Park, CO
May 31, 2014*

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

Certificate of Completion

This Will Certify That

Caoimhín P. Connell

Successfully Completed

Prescription Drug Crimes

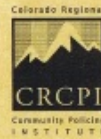
7 Hours Completed

At: CO Law Enforcement Officers Assn. On: September 30, 2010
Greeley, Colorado



P. Ritch Wagner
Instructor

Director, Law Enforcement Liaison & Education



Certificate of Training

This is to certify that
Caoimhin Connell

(Name)

Park County Sheriff's Office

(Agency)

If the bearer of this document possesses a 40 Hour certificate pursuant to 29 CFR §1910.120, this certifies the above named has met the refresher training requirements of 29 CFR §1910.120(e)(8) and is hereby **RECERTIFIED** in Clandestine Laboratory Safety / HazWoper

Sponsored by
Rocky Mountain High Intensity Drug Trafficking Area
Colorado Regional Community Policing Institute

Caoimhin P. Connell 4/12/10
Caoimhin P. Connell, Instructor/Date
Glean HARDEY



Colorado Law Enforcement Officers' Association



This is to certify that

CAOIMHIN CONNELL

Completed **ARIDE (Advanced Roadside Impaired Driving Enforcement)**

hosted by **Loveland Police Department**

on **February 28 – March 1, 2011**

Tom Finelle
Tom Finelle, CLEOA President

M. A. [Signature]
ARIDE Instructor

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
HEREBY AWARDS THIS CERTIFICATE
AS INSPECTOR OF VEHICLE IDENTIFICATION NUMBERS
TO

CAOIMHIN PADRAIG CONNELL

August 27, 2008

Date

VIN INSP— **0952**

Number

For fulfilling the prescribed requirements as an Inspector of Vehicle Identification Numbers and as a peace officer in Colorado, pursuant to Title 42, Article 5, Section 206 Colorado Revised Statutes.

Bill Ritter Jr.

Governor

John W. Suthers

Attorney General, Board Chairperson

Certificate of Completion Intoxilyzer 9000 Operator Certification Course

*The Evidential Breath Alcohol Testing Program of the
Colorado Department of Public Health and Environment certifies that*

Caoimhin P Connell

User ID: **841645**

*has successfully completed the "Intoxilyzer 9000 Operator Certification Course"
to determine the alcohol concentration in breath specimens pursuant to the
State Board of Health Rules Pertaining to Testing for Alcohol and Other Drugs (5 CCR 1005-2)
Training was provided by the Evidential Breath Alcohol Testing Program
of the Colorado Department of Public Health and Environment.*

February 21, 2013

Certificate Date

Jeffrey A. Groff

Jeffrey A. Groff, Program Manager
Evidential Breath Alcohol Testing Program



David A. Butcher

David A. Butcher, Director
Laboratory Services Division
Colorado Department of Public Health
and Environment

Certification expires 180 days from certificate date. Recertification must be per 5 CCR 1005-2.



Certificate of Achievement

awarded to:

Caoimhin P. Connell

Has successfully completed Methamphetamine Lab Cleanup Management and Supervision training in accordance with 29 CFR 1910.120 and State Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (8Hrs.)

June 1st, 2005

Date

Signed

HAZMAT Plans & Programs, Inc. 30 S. Havana St. Suite 304F Aurora, Colorado 80012 (303) 360-9801
"Safety Plans, Programs and Training Tailored To The Needs Of Your Business"

CERTIFICATE OF COMPLETION

COLORADO LAW ENFORCEMENT ASSOCIATIONS TRAINING PROJECT

This Certifies That

Caoimhin Connell

Has Attended the

CLEAT 40-HOUR

Train the Trainer Course

Hosted by Breckenridge Police Department
August 14-18, 2006

Karen M. Renshaw, CAE
Executive Director
Colorado Association of Chiefs of Police

John L. Kammerzell
Executive Director
Police Officer Standard & Training

Donald E. Christensen
Executive Director
County Sheriffs of Colorado



COLORADO AUTO THEFT INVESTIGATORS



SINCE 1973

This is to certify that

Caoimlin P. Connell

Has completed a 24 hour training program in Vehicle Identification Number
Inspection

Presented this 24th day of May, 2008

CATI President

VIN Inspector Training Coordinator

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
AWARDS THIS CERTIFICATE
TO

CAOIMHIN PADRAIG CONNELL

May 6, 2004

Date

B- 10670

Number

For fulfilling the prescribed requirements for certification. This certificate expires three years from date of issuance unless the certificate holder meets the requirements for continued certification as established by law and the P.O.S.T. Board.

Governor

Attorney General, Board Chairperson

**Rocky Mountain
High Intensity Drug Trafficking
Area**



Certifies that



Caoimhín Connell

has attended

16 hours of

MCTC / RMHIDTA Indoor Marijuana Grows

Centennial, CO

August 28-29, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

CERTIFICATE OF TRAINING

THIS IS TO CERTIFY THAT

Caoimhín Connell

Has completed 4 hours of successful training for

The Hazards of Hash Oil Extraction

Held at IRIS Fire Investigations in Englewood, CO

on this 7th day of November, 2014

Robert K. Toth
IRIS Fire Investigations, President



COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Caoimhin Connell
Forensic Applications Consulting Technologies Inc
185 Bounty Hunter Ln
Bailey, CO 80421

Consultant Interim Authorization Approval

Dear Caoimhin Connell:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Interim Authorization**. This interim authorization approval shall expire on June 15, 2015.

Assessment and sampling of methamphetamine-affected properties may only be conducted by Consultant Firms that have received interim authorization under Part 2, Section 3.2.4 of the Regulations. Therefore, this interim authorization may only be used to conduct assessment and sampling of methamphetamine-affected properties for a Consultant Firm that has received interim authorization approval from the Department.

Approved By: _____

Date: _____

12/30/2014





COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Forensic Applications Consulting Technologies Inc
185 Bounty Hunters Ln
Bailey, CO80421

Consultant Firm Interim Authorization Approval

Dear Forensic Applications Consulting Technologies Inc:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Firm Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Firm Interim Authorization**. The firm shall only utilize individuals who have received interim authorization under Part 2, Section 3.2.1 of the Regulations to conduct assessment and sampling of methamphetamine-affected properties. This interim authorization approval shall expire on June 15, 2015.

The Regulations require submittal of electronic copies of reports to the Department. Electronic copies of reports should be submitted via email to cdphe_methlabdocuments@state.co.us. The words "report" or "report submittal" should be included in the email subject line, and the property address should be included in the body of the email.

Alternatively, compact disks with electronic copies of reports may be mailed to:

Colorado Department of Public Health and Environment
Hazardous Material and Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Attn: Colleen Brisnehan or Richard Mruz

Packages may also be hand delivered to the Department's mail room located in the northwest corner of Building B (700 South Ash Street).

Approved By: _____

Date: 12/30/2014

