



**Weld County Attorney's Office**  
(970) 336-7235  
1150 O St., P.O. Box 758  
Greeley, CO 80632

January 9, 2026

**VIA EMAIL**

Ms. Madison L. Schaefer, Esq.  
Killmer Lane, LLP  
1543 Champa St., Ste. 400  
Denver, CO 80202  
[mschaefer@killmerlane.com](mailto:mschaefer@killmerlane.com)

RE: Weld County Sheriff's Office CCJRA Policy

Dear Ms. Schaefer:

This letter is in response to your letter dated December 12, 2025 (the "12/12 letter"). Please be advised that Mr. Grumet is no longer affiliated with Weld County and all future communications on this matter should be sent to my attention.

We do not believe your threatened litigation is meritorious, but the Sheriff's Office has clarified its policies in a way that hopefully resolves most of your client's concerns. In this letter, I will explain what the policy is and why we made it this way.

The 12/12 letter does not lay out a complete picture of relevant sections of the Colorado Criminal Justice Records Act, C.R.S. §§ 24-72-301 et seq. For example, the letter cites C.R.S. § 24-72-303(1) but omits the second half of the section. In full, the section reads:

"Each official action as defined in this part 3 shall be recorded by the particular criminal justice agency taking the official action. Such records of official actions shall be maintained by the particular criminal justice agency which took the action and shall be open for inspection by any person at reasonable times, except as provided in this part 3 or as otherwise provided by law. The official custodian of any records of official actions may make such rules and regulations with reference to the inspection of such records as are reasonably necessary for the protection of such records and the prevention of unnecessary interference with the regular discharge of the duties of the custodian or his office" (emphasis added).

The law also distinguishes between records of official actions and other criminal justice records. See C.R.S. § 24-72-304(1) (granting discretion to the official custodian on all other criminal justice records along with the authority to make reasonable policies regarding inspection). The General Assembly has decided to protect the dignity of individuals involved with the criminal



**Weld County Attorney's Office**  
(970) 336-7235  
1150 O St., P.O. Box 758  
Greeley, CO 80632

justice system by protecting their personal information contained in criminal justice records from use for solicitation. C.R.S. § 24-72-305.5(1). As such, an official custodian of criminal justice records is required to deny access to records unless the requestor signs a statement which affirms that such records shall not be used for the direct solicitation of business for pecuniary gain. Id. The question for the Sheriff is then how to implement this statutory mandate in a reasonable manner.

Prior to 2023, the Weld County Sheriff's Office required individuals to appear in person with identification to submit CCJRA requests. This was the only feasible way to ensure that such person was the one signing the affirmation as required by statute. It also remains an option for any person who wishes to get criminal justice records from WCSO, which your clients know. See <https://coloradofoic.org/attorney-for-9news-and-colorado-public-radio-requiring-notarization-of-records-request-forms-an-unreasonable-hurdle/> (quoting Aaron Adelson).

To lessen the burden on requestors while still fulfilling their statutory duties, the WCSO changed its policy to allow a requestor to submit requests online and provide a notarized affirmation that the requestor will not use the information for the direct solicitation of business for pecuniary gain. As is common for legally binding affirmations, requiring this to be acknowledged in front of a notary gives us confidence that the individual who signed the document is who they say they are and did in fact execute the document. It is hard to fathom how the gossamer thread of notarizing a signature ever causes an undue burden for any given request. Of course there are other ways to authenticate, but notarization is the one that most easily allows the Weld County Sheriff's Office to provide records to the broadest number of people while not interfering with the Sheriff's primary duty of keeping the peace in Weld County.

Though you baldly assert that Weld County is the only entity in Colorado that has this requirement, as the Colorado Freedom of Information Coalition easily identified in the article referenced above, Eagle County also requires notarization. Though it is true that some jurisdictions only require the requestor to submit a copy of their ID along with the request (see, e.g., City of Lakewood), it is the Sheriff's position that this makes it too easy for someone to impersonate another when making a request as they would only need to get a copy of a random ID and then send the request with that name. A scanned ID requirement also negatively impacts honest individuals who do not have ID or who want to remain relatively anonymous by not providing their address or other information contained on an ID. A notarized statement only requires them to give us their name as the notary maintains all the other identification information.

The unfortunate reality, as we have explained to your clients before, is that the WCSO needs to make policy that prevents bad actors from misusing our criminal justice records. This will inevitably cause some inconvenience to good actors, but the law requires no less from us. Given the wide variety of reasonable policy positions, we believe requiring notarization best balances



**Weld County Attorney's Office**

(970) 336-7235

1150 O St., P.O. Box 758

Greeley, CO 80632

everyone's interests and can be fairly and neutrally applied. The Weld County Sheriff's Office will therefore continue to require notarized affirmations from requestors who make CCJRA requests.

The Sheriff's Office recognizes that requiring too many forms can cumulatively cause a headache for people who submit many requests. To ameliorate this concern, and as you reference in your letter, we only require a single notarized statement once a year from a person. Where there may be some confusion is that a person under the CCJRA can be either an individual or a corporate entity. See C.R.S. § 24-72-302(9) (defining "person" broadly). Therefore, to be clear, we will only need a single notarized statement once a year from each of your clients who would execute it on behalf of the corporate entity and would cover the requests of any employees. We enforce this policy by looking at the email address included with the request. For example, once we have a signed, notarized statement from 9News that the records provided in a response to a request submitted by an employee of 9News will not be used for the direct solicitation of business for pecuniary gain, we would not require any signed, notarized statements from anyone with an "@9News.com" email address for a year. It was not clear from your letter whether your clients' concern is with any amount of notarization or with the perceived total number of notarizations required, but if it is the latter, then we hope this clarification helps to put your clients at ease.

As I mentioned above, the Weld County Sheriff's Office has thought about the need for CCJRA notarization for years and we believe our policies and procedures are reasonable. Given that your letter does not cite any unfulfilled CCJRA request for either client, we believe any threatened litigation would be a frivolous waste of resources as your clients have readily available relief under the CCJRA and no extant injury to a legally protected interest. Since your letter cites the CCJRA remedy provisions, you clearly know this and therefore Weld County will seek sanctions along with attorney's fees and costs against you, your firm, and your clients in the event you proceed with litigation.

Sincerely,

A handwritten signature in black ink that reads "Matthew Conroy". The signature is written in a cursive style.

Matthew Conroy

Assistant Weld County Attorney

Cc: Steve Reams, Weld County Sheriff  
Bruce Barker, Weld County Attorney  
Karin McDougal, Deputy Weld County Attorney