

STATE OF COLORADO
COUNTY OF DENVER

AFFIDAVIT OF PROBABLE CAUSE
FOR ARREST WARRANT

DO2120010003724
DIV 4

STATE OF COLORADO)
) SS.
COUNTY OF DENVER)

I, KENNETH D BOHLING of lawful age and being first duly sworn upon oath, depose and state I have probable cause for believing that BRIGITTE CLEROUX ANDREWS aka BRIGITTE DENISE ANDREWS, BRIGITTE D ANDREWS, BRIGITTE D CLEROUX, BRIGITTE DENISE CLEROUX, BRIGITTE CLEROUX, BRIGITTE DENISE CLEROUX-BROOKS, BRIGITTE HOLLOWAY, JAYMEE B PAVELICH, JAYMEE BRIGITTE PAVELICH, BRIGITTE DENISE CLAIROUX DOB 01/03/72, did commit the crime(s) of

- 1) FORGERY CRS 18-5-102 (1)(e), a Class 5 Felony
- 2) CRIMINAL IMPERSONATION CRS 18-5-113 (1)(e), a Class 6 Felony
- 3) UNLAWFUL ACTS - NURSES (Nurse Practice Act) CRS 12-38-123 (1)(d), a Class 3 Misdemeanor

Between August 30, 2001 and September 4, 2001, within the City of Colorado Springs, County of El Paso, State of Colorado, and as grounds therefor states as follows:

I am a peace officer with the Colorado Attorney General's Office and the following information was obtained by me personally and from the official records of the aforementioned office.

1. I have been a law enforcement officer for nineteen (19) years, of which fifteen (15) years were with the Wheat Ridge Colorado Police Department. I have investigated felony level crimes throughout my tenure as a law enforcement officer. I have conducted or been the lead investigator on numerous cases relating to fraud or financial investigations. I have been an Investigator with the Medicaid Fraud Control Unit (MFCU) of the Colorado Attorney General's Office for approximately 4 years.

2. Through experience and training with the MFCU, I have learned:

A. The Registered Nurse (RN) license issued by the Colorado Board of Nursing is a written instrument officially issued or created by a government agency. The Colorado Board of Nursing also issues Professional License Verifications on a written instrument issued by the State of Colorado Board of Nursing.

B. That for the purposes of Unlawful Acts CRS 12-38-123 (within the Nurse Practice Act) "registered nurse" or registered professional nurse" means a professional nurse, and only a person who holds a license to practice professional nursing in this state pursuant to

the provisions in Title 12, Article 38 of the Colorado Revised Statutes shall have the right to use the title "registered nurse" and its abbreviation "R.N."

3. On September 6, 2001, the Colorado Board of Nursing (BON) forwarded a complaint to the MFCU. This complaint stated BRIGITTE CLEROUX ANDREWS had applied for work as a Registered Nurse - Critical Care with Interim Staffing 1901 N Union Suite 202 Colorado Springs, Colorado on August 30, 2001. The complaint alleged that BRIGITTE CLEROUX ANDREWS had presented forged credentials that indicated she was licensed as a Registered Nurse with experience in Critical Care and Pediatric Critical Care. MARGIE SHUPE, Branch Manager Interim Staffing - Colorado Springs, made the complaint to BON. BON had no record of BRIGITTE CLEROUX ANDREWS being licensed as a Registered Nurse in Colorado.

4. On September 7, 2001, I interviewed MARGIE SHUPE by telephone. SHUPE told me that on August 30, 2001, a female who identified herself as BRIGITTE CLEROUX ANDREWS came to Interim Staffing's office to inquire about employment. ANDREWS told her she was a critical care / pediatrics nurse and wanted to know how soon she could go to work. SHUPE told ANDREWS she could work immediately after her credentials and references were checked out. ANDREWS had brought in copies of her Colorado nursing license verification License Number RN , Colorado ID card, Advanced Cardiac Life Support (ACLS) card, and Pediatric Advanced Life Support Program (PALS) card. All the credentials were given to BETH CROCKETT - Staffing Associate at Interim Staffing.

When SHUPE and CROCKETT tried to verify ANDREWS' Colorado Nursing License through the automated system at the Colorado Board of Nursing (BON), they found the license number came back to someone named ELLEN ROGERS. Thinking there was a problem with the system at the Board of Nursing, they called ANDREWS on September 1, 2001 and told her it would probably be Tuesday September 4, 2001 before they could get her nursing license verified.

On Tuesday September 4, 2001, SHUPE contacted the BON and spoke with someone (unknown who) concerning ANDREWS. The license number given to her by ANDREWS was verified as belonging to a Registered Nurse named ELLEN ROGERS and not ANDREWS.

On Tuesday September 4, 2001, SHUPE had contacted Maxim Healthcare in Colorado Springs, as ANDREWS had listed that she had worked for them. SHUPE went to Maxim's office and spoke with "George" about ANDREWS. Maxim gave SHUPE a copy of the nursing license verification form that ANDREWS had given to Maxim. The name on the form Maxim had was "Brigitte D Cleroux", and the name was handwritten. The name on the verification form that ANDREWS had given Interim Staffing was "Brigitte D Andrews", and was typed. The date on both forms was April 24, 2001.

On Wednesday September 5, 2001, she called ANDREWS and left a message on her answering machine, telling ANDREWS that they were unable to verify her nursing license and that ANDREWS should contact them. She has never heard back from ANDREWS.

Since the credentials presented by ANDREWS appeared to be false, SHUPE contacted the BON to report the incident.

5. On September 10, 2001, I interviewed BETH CROCKETT, Staffing Associate at Interim Staffing - Colorado Springs. On the morning of August 30, 2001, she received a telephone call from a female who identified herself as BRIGITTE ANDREWS. ANDREWS told her that she was an Advanced Cardiac Life Support (ACLS) certified nurse with twenty (20) plus years of experience, and that she was seeking a position in an emergency room. ANDREWS told her she needed to work right away and would be in to the offices of Interim Staffing to fill out an application. ANDREWS came in later on August 30, 2001, bringing copies of the following documents with her:

- Professional Nursing License Verification form - BRIGITTE D ANDREWS, RN license number dated April 24, 2001
- BLS for Healthcare Providers Program card - BRIGITTE D CLEROUX, issued 03-03-03
- Certificate of Attendance - BRIGITTE D ANDREWS, Trauma Nursing Core Course (Provider) 16 Total Continuing Education Contact Hours, dated December 3 & 4 1998
- Colorado Identification Card - BRIGITTE DENISE CLEROUX, DOB 01/03/72.
- Advanced Cardiac Life Support Program card and Pediatric Advanced Life Support Program card - BRIGITTE D ANDREWS

CROCKETT never saw the originals of these documents as ANDREWS had already made copies.

She had ANDREWS fill out an application and associated paperwork. She then had ANDREWS take a variety of tests to test ANDREWS knowledge of Critical Care Nursing, Pediatrics Nursing, IV Therapy, NICU, and RN competency. ANDREWS passed all the tests.

On August 31, 2001, when CROCKETT began to put an employee file together for ANDREWS, she noticed some irregularities in the DOBs and Social Security Numbers. CROCKETT noticed what appeared to be three (3) separate DOBs and Social Security Numbers on the paperwork filled by ANDREWS on August 30, 2001. CROCKETT then looked at the Professional Nursing License verification form and saw some irregularities on the form that concerned her. The irregularities on the Professional Nursing License Verification form included ANDREWS' name being typed on the form, but the rest of the information on the form was handwritten in, and that the lines where the various information was written on appeared to have been altered.

On August 31, 2001, CROCKETT had ANDREWS bring in a copy of her birth certificate. The birth certificate was in the name BRIGITTE CLEROUX DOB January 3, 1972. The birth certificate indicated it had been issued on July 25, 2001. ANDREWS told CROCKETT she was willing to work anywhere, nursing homes, long term care center, etc., if she could not be staffed as a critical care nurse.

CROCKETT was never able to verify that ANDREWS was licensed as a nurse in Colorado.

6. On September 10, 2001, I interviewed MARGIE SHUPE. I reviewed what SHUPE had told me over the telephone on September 7, 2001 with her. I then asked SHUPE for copies of any documents that ANDREWS had either presented to them or had filled out while in their office on August 30, 2001. SHUPE gave me copies of the following documents.

- Application for employment - Brigitte Andrews, dated August 30, 2001
- September 2001 availability schedule - Brigitte Andrews, dated August 30, 2001
- Job Description Registered Nurse - Brigitte Andrews, dated August 30, 2001
- Professional Nursing License Verification form from Maxim Healthcare - Brigitte D Cleroux, dated April 24, 2001
- Professional Nursing License Verification form given to Interim Staffing - Brigitte D Andrews, dated April 24, 2001
- Individual Search Results List DORA - Brigitte Andrews & Brigitte Cleroux
- Background check form - Brigitte D Andrews, dated August 30, 2001
- W-4 form - Brigitte Andrews, dated August 30, 2001
- Employment Eligibility Verification form - Brigitte D Andrews, dated August 30, 2001
- Birth Certificate - Brigitte Cleroux, DOB January 3, 1972, issued July 25, 2001
- BLS card - Brigitte D Cleroux, issue date 03/03/03
- Trauma Nursing Core Course (Provider) certificate - Brigitte D Andrews, date of course December 3 & 4, 1998
- Interim Healthcare Employee Status Report - Brigitte D Andrews
- Colorado Identification Card - Brigitte Denise Cleroux, expires 01/03/2011
- ACLS card - Brigitte D Andrews (issue date 03/29/01) and PALS card - Brigitte D Andrews (issue date 11/19/98)
- Reference form from Maxim Healthcare concerning Brigitte Andrews
- Telephone reference check from Elaine Tucker concerning Brigitte Andrews, dated August 30, 2001
- Test Answer Sheets RN Comp, IV Therapy Test, Critical Care, NICU, and Ped A - B Andrews, all dated August 30, 2001
- Critical Care Skills Profile (2 pages) - B Andrews, dated August 30, 2001
- Emergency Room Skills Profile (2 pages) - B Andrews, dated August 30, 2001
- Clinical Skills Profile (3 pages) - B Andrews, dated August 30, 2001

8. On September 10, 2001, I checked the name BRIGITTE CLEROUX ANDREWS DOB 01/03/72, through the Colorado Crime Information Center (CCIC) / National Crime Information Center (NCIC) computer system. I found no record of any type under the last name ANDREWS. I did find a record for a Colorado Identification card under the name BRIGITTE DENISE CLEROUX DOB 01/02/72. I located a criminal history in Colorado and Florida associated with the name BRIGITTE DENISE CLEROUX DOB 01/03/72. The Social Security Number associated with the criminal histories in Colorado and Florida is . The criminal history in Florida is under the name JAYMEE B PAVELICH and BRIGITTE DENISE CLEROUX is listed as an aka. I also located an arrest warrant out of the Broward County Sheriff Office in Fort Lauderdale, Florida under the name BRIGITTE DENISE CLAIROUX DOB 01/03/72.

9. I reviewed the copies of the documents I received from MARGIE SHUPE at Interim Staffing and noted the following:

- On the Application for Employment dated August 30, 2001, the Social Security Number listed by ANDREWS is
- On the Professional Nursing License Verification form from Maxim Healthcare - Brigitte D Cleroux, dated April 24, 2001, there appears to some type of alteration on the form in the area before where the name "Brigitte D Cleroux" is written.
- On the Professional Nursing License Verification form given to Interim Staffing - Brigitte D Andrews, dated April 24, 2001, there appears to be some type of alteration on the form in the area before where the name "BRIGITTE D ANDREWS" is typed. The name "BRIGITTE D ANDREWS" is typed on the form, but the rest of the information on the form is handwritten. The handwriting on this form appears to be the same as the handwriting on the Professional Nursing License Verification form from Maxim Healthcare - Brigitte D Cleroux, dated April 24, 2001.
- On the Background check form - Brigitte D Andrews, dated August 30, 2001, the DOB listed is January 31, 1970. The Social Security Number listed is
- On the W-4 form - Brigitte Andrews, dated August 30, 2001, the Social Security Number listed is
- On the Employment Eligibility Verification form - Brigitte D Andrews, dated August 30, 2001, the DOB listed is either January 3 or 31, 1972. The Social Security Number listed is
- On the BLS Healthcare Provider card - Brigitte D Cleroux, the issue date is listed as "03-03-03".
- On the Interim Healthcare Employee Status Report - Brigitte D Andrews, the DOB is listed as January 3, 1972. The Social Security Number is listed as
- On the Critical Care Skills Profile (2 pages) - B Andrews, dated August 30, 2001, Emergency Room Skills Profile (2 pages) - B Andrews, dated August 30, 2001, and Clinical Skills Profile (3 pages) - B Andrews, dated August 30, 2001, the title of R.N. was signed ANDREWS

10. I contacted Investigator Linda Volz, Colorado Department of Regulatory Agencies, concerning the documents I had received from Interim Staffing on September 10, 2001. Linda Volz checked on the RN license number (RN) which was on the Professional Nursing license verification forms received by Interim Staffing and Maxim Healthcare in Colorado Springs, Colorado. RN License number belongs to ELLEN ROGERS RN. ROGERS told Linda Volz when contacted on September 19, 2001 that her portfolio had been stolen from Memorial Hospital in Colorado Springs, Colorado sometime in either May or June 2001. ROGERS said that her portfolio is required by the hospital for the employee review process, and that her portfolio contained a copy of her Colorado Registered Nurse License, copies of her education documents and degrees, CPR card and other documents relating to her training as an RN.

11. On September 19, 2001, Linda Volz spoke with MARGIE SHUPE at Interim Staffing. SHUPE told Linda Volz that one of the references that ANDREWS had given when she applied

for work at Interim Staffing was someone named ELAINE TUCKER. ELAINE TUCKER was contacted by SHUPE. TUCKER told SHUPE that she had worked with ANDREWS at Maxim Healthcare.

12. On September 20, 2001, Linda Volz contacted PAM BAUDENDISTEL, Director of Nursing Maxim Healthcare - Colorado Springs. BAUDENDISTEL told Linda Volz that ANDREWS had contacted her on September 17, 2001 and was very anxious to start working for the company again. BAUDENDISTEL further told Linda Volz that she had copies of various documents from ANDREWS that she felt were obvious forgeries because of whiteout and highlighter marks on the documents. BAUDENDISTEL also related that ELAINE TUCKER is also known as ELAINE TUCKER ANDREWS and is BRIGITTE ANDREWS' mother-in-law. ELAINE TUCKER ANDREWS is currently employed by Maxim Healthcare - Colorado as a Registered Nurse.

13. On September 20, 2001, I received an affidavit from Ruth Takeda, Administrative Program Specialist - Colorado Board of Nursing. The affidavit concerns BRIGITTE CLEROUX ANDREWS. Ruth Takeda is the official custodian for the Colorado Board of Nursing records. Ruth Takeda advised that the Colorado Board of Nursing records reflect that ANDREWS is not currently licensed as a nurse in the State of Colorado, and that she has never been licensed as a nurse in Colorado. The records also reflect that ANDREWS has not applied for licensure as a nurse in the State of Colorado.


14. Investigator Linda Volz spoke with Shaniece Owens, Administrative Assistant at the Colorado Board of Nursing, concerning the Professional License verification forms. Owens advised Linda Volz that no information is ever typed on to a Professional License Verification, and that all the information is handwritten.

Based on the aforementioned information, I believe BRIGITTE CLEROUX ANDREWS aka BRIGITTE DENISE ANDREWS, BRIGITTE D ANDREWS, BRIGITTE D CLEROUX, BRIGITTE DENISE CLEROUX, BRIGITTE CLEROUX, BRIGITTE DENISE CLEROUX-BROOKS, BRIGITTE HOLLOWAY, JAYMEE B PAVELICH, JAYMEE BRIGITTE PAVELICH, BRIGITTE DENISE CLAIROUX DOB 01/03/72, has violated Colorado Revised Statute Sections 18-5-102 (1)(e) FORGERY, 18-5-113 (1)(e) CRIMINAL IMPERSONATION, and 12-38-123 (1)(d) UNLAWFUL ACTS - NURSES (Nurse Practice Act)

BRIGITTE CLEROUX ANDREWS

AFFIDAVIT OF PROBABLE CAUSE
FOR ARREST WARRANT

I therefore request the Honorable Court issue an arrest warrant for BRIGITTE CLEROUX ANDREWS aka BRIGITTE DENISE ANDREWS, BRIGITTE D ANDREWS, BRIGITTE D CLEROUX, BRIGITTE DENISE CLEROUX, BRIGITTE CLEROUX, BRIGITTE DENISE CLEROUX-BROOKS, BRIGITTE HOLLOWAY, JAYMEE B PAVELICH, JAYMEE BRIGITTE PAVELICH, BRIGITTE DENISE CLAIROUX DOB 01/03/72.


Affiant

Subscribed and sworn before me this 21 day of September 2001


Judge