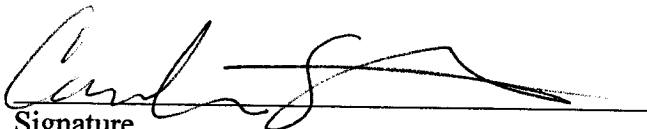


☐ Small Claims ☐ County Court ☒ District Court ☐ Probate Court ☐ Juvenile Court Larimer County, Colorado Court Address: 201 LaPorte Avenue, Fort Collins, CO 80521	DATE FILED: August 7, 2017 CASE NUMBER: 2017CV208
Caroline Steinbrecher -vs Larimer County Coroner / James Wilkerson 445 Denver Ave Loveland CO 80537	▲ COURT USE ONLY ▲ Case Number: 17CV208 Div.: Ctrm: 5A
(Name & Address) Caroline Steinbrecher PO Box 1321 Loveland CO 80539 Phone Number: 970-584-4520	
Failure to comply and Failure to fulfill their duties Complaint for Summons	

Please see attached.


 Signature

CERTIFICATE OF SERVICE

I certify that on _____ (date) a true and accurate copy of the _____
 was served on the other party by:
☐ Hand Delivery, ☐ Faxed to this number _____, or
☐ by placing it in the United States mail, postage pre-paid, and addressed to the following (include name and address):
 To: _____

☐ Petitioner/Plaintiff or ☐ Respondent/Defendant

①

Larimer County Coroner's Office has not responded or complied to greater than 30 requests for my 8 yr old boy's tissue samples to be released to his mother for DNA testing and further diagnostics with a private forensic pathologist. These requests for my son's tissue samples have repeatedly been made in writing, via emails, and phone calls for over 10 months.

*If the deceased is a child and an unknown cause of death the coroner ~~must~~ keep samples and provide them to family.
Dates:

on June 8 2016 Jake Steinbrecher 8 yrs old died from medical error

My son's body was left at the coroner for over 2 weeks, with constant communication from me to take extra tissue samples of everything prior to cremation. It took a near record breaking 5 months to issue a death certificate.

In Sept. 2016 prior to Larimer County Coroner completed D/C I became suspicious. I sought a second opinion autopsy and

②

secured a private pathologist. At that time the coroner's office became defensive and made many excuses to delay shipping of tissue for 3 weeks. Stating the cause "We have to go through Jake's tissues by hand"

For me this was unacceptable! After nearly 5 months there should be "NO" search through my son's tissues to label them.

In October my former law firm demanded the tissues be secured. Then over the next 8 months sent more than 5 demands with shipping labels for my son's tissues to be sent to their lab. These requests were NEVER responded to or did they occur.

I learned in March of 2017 that the Larimer County coroner's office would NOT respond to the whereabouts of my child's tissue. I demanded

③

they be released for DNA testing
Now.

I have represented myself since April 2017.
I have made hundreds of requests
to the Larimer County Coroner to
release my child's tissue samples to
my private pathologist for DNA testing
and further diagnostics. Not once
will they respond. In fact, they
will not acknowledge my request and
will in addition hang up on me, if
I call asking where my son's tissues are.

This is an abuse of this office not to comply.

Once again: If it is a child and the cause
of death is unknown. It is common
knowledge the tissues are to be preserved forever.
Where are they?

Second: As Sole Representative on my son's estate
the tissues are "property" both as my
son's sole representative and simply as his
Mother I am entitled to my son's
tissues to be sent out for analysis
as many times as I request.

(4)

As of Last Week 8-2-2017

The coroner's office and the Lorain Police will ~~not~~ Not reply to even lawyers and Judges as to where my child's tissue samples are.

I have contacted the FBI this has and is a failure to ~~fulfill~~ ~~FBI~~ fulfill the office's duties as an elected official and this office is not complying with the Law.

The Lorain Police Department and the Lorain County Sheriff is refusing to help me or take my complaint that my son's tissues have been tampered with. They also will not respond.

Again, I have filed a complaint with the FBI on all 3 depart ments.

I am demanding my son's tissues samples, per my forensic pathologist, be shipped. The request is for fresh cuts of all the samples including but not limited to the brain be submitted for DNA testing. and further diagnosis etc.

Carl [Signature]