

DISTRICT COURT, 12th JUDICIAL DISTRICT 8955 Independence Way Alamosa, Colorado 81101 (719) 589-4996	
<p style="text-align: center;">THE PEOPLE OF THE STATE OF COLORADO</p> <p>vs.</p> <p>KEITH SCHULTZ, Defendant</p>	▲ COURT USE ONLY ▲
ANNE E. KELLY District Attorney - 12th Judicial District 601 Main Street Alamosa, Colorado 81101 Phone: (719) 589-3691 Registration # 38885	Case No: <i>26CR504</i> Courtroom:
12TH JUDICIAL DISTRICT GRAND JURY INDICTMENT	

Of the 2025-2026 term of the 12th Judicial District Grand Jury in the year 2026, the 2025-2026 12th Judicial District Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following indictment and described acts, all committed within the County of Costilla, State of Colorado, all done contrary to the form of statutes in such case made and provided, and against the peace and dignity of the People of the State of Colorado, as stated in the counts attached hereto:

COUNT 1: ABUSE OF CORPSE, C.R.S. 18-13-101

Between and including October 2, 2024, and August 19, 2025, Keith Schultz unlawfully, feloniously and knowingly, without statutory or court-ordered authority, treated the body or remains of any person in a way that would outrage normal family sensibilities; in violation of section 18-13-101, C.R.S.

COUNT 2: SECOND DEGREE OFFICIAL MISCONDUCT, C.R.S. 18-8-405

Between and including October 2, 2024, and August 19, 2025, Keith Schultz, a public servant, unlawfully, knowingly, arbitrarily, and capriciously refrained from performing a duty imposed upon him by law, to wit: the duty imposed by C.R.S. 30-10-606 (1) to notify the coroner when a death is discovered or confirmed as soon as practicable after the scene is safe and secure; in violation of section 18-8-405, C.R.S.

COUNT 3: SECOND DEGREE OFFICIAL MISCONDUCT, C.R.S. 18-8-405

Between and including October 2, 2024, and August 19, 2025, Keith Schultz, a public servant, unlawfully, knowingly, arbitrarily, and capriciously violated a statute or lawfully adopted rule or regulation relating to his office, to wit: the duty imposed by C.R.S. 30-10-606 (1) & (1)(h) to cooperate with the coroner to make all proper inquiry in order to determine the cause and manner of death of a person who died in his jurisdiction and whose remains are skeletonized; in violation of section 18-8-405, C.R.S.

COUNT 4: SECOND DEGREE OFFICIAL MISCONDUCT, C.R.S. 18-8-405

Between and including October 2, 2024, and August 19, 2025, Keith Schultz, a public servant, unlawfully, knowingly, arbitrarily, and capriciously violated a statute or lawfully adopted rule or regulation relating to his office, to wit: the duty imposed by C.R.S. 30-10-606 (1.2)(b) prohibiting the removal of remains from the place of death prior to the arrival of the coroner or his or her designee or without the authority of the coroner or his or her designee and without justification for said removal; in violation of section 18-8-405, C.R.S.

COUNT 5: SECOND DEGREE OFFICIAL MISCONDUCT, C.R.S. 18-8-405

Between and including October 2, 2024, and August 19, 2025, Keith Schultz, a public servant, unlawfully, knowingly, arbitrarily, and capriciously violated a statute or lawfully adopted rule or regulation relating to his office, to wit: the duty imposed by C.R.S. 24-80-1302 (1) to immediately notify the coroner upon the discovery of skeletonized remains; in violation of section 18-8-405, C.R.S.

Probable causes as to the offenses alleged in Counts 1 through 5 are as follows:

██ testified before the Grand Jury. The evidence, including all exhibits admitted, and testimony from this witness during the grand jury session(s) established the following facts:

██████████ testified about his training, experience, and background in law enforcement, which includes experience as a law enforcement officer in multiple law enforcement agencies prior to joining the 12th Judicial District Attorney's Office as an Investigator. He was offered to the Grand Jury as an expert in criminal investigations based on his experience.

██████████ testified that on August 18, 2025, ██████████ contacted the District Attorney's Office regarding possible human remains he had found on his property, located near Wild Horse Mesa in Costilla County, Colorado. ██████████ reported that around October 2024, he found a skull, dental work, and other remains. ██████████ photographed the remains in place, marked the locations, and reported his findings to the Costilla County Sheriff's office. ██████████ photographs show what appears to be a human skull and human teeth with silver-colored dental work on the ground among the brush and plant debris.

Upon receiving this report from [REDACTED] [REDACTED] was able to retrieve dispatch notes from October 2, 2024, showing that Costilla County Sheriff's Office Deputy Charles Keith Shultz was dispatched to 16345 Eagle Nest Road where the reporting party (listed as Nick Younghand) stated he had found a small skull with teeth and dental work. Deputy Schultz's final comment in his report stated "will come back during the bones."

[REDACTED] responded to the location and met [REDACTED] [REDACTED] said that when the Costilla County Sheriff's office responded, Sheriff Sanchez and Deputy Schultz only retrieved the skull but left the rest of the remains. They never returned to collect the rest of the remains. [REDACTED] reported that the Sheriff's Office did not collect the teeth seen in his photographs and that they were now lost. [REDACTED] stated that Sheriff Danny R. Sanchez was present at the time of collection, but was only on scene briefly and was reported to be more interested in looking for arrowheads than investigating the human remains. [REDACTED] showed [REDACTED] the uncollected remains still on the scene, and he observed at least a half dozen items of human remains as well as human clothing and shoes. [REDACTED] opined that the location of the remains was very unusual due to the remote location, and that the circumstances did not indicate an animal attack as the cause of death.

[REDACTED] next made contact with the Costilla County Sheriff's office to seek information regarding their efforts. [REDACTED] was able to retrieve the only police report regarding the incident. The report indicated that while the initial contact occurred on October 2, 2024, the document was not written until December 31, 2024, and not officially approved until March 18, 2025. [REDACTED] testified that the report stated that Deputy Schultz put the bones in a bag, left the bag with the bones unsecured on his desk at Sheriff's office while he went out on another call. The report further stated that when Deputy Schultz returned, the bag with the bones was gone, whereupon Sheriff Sanchez stated he had transferred the bones to [REDACTED] [REDACTED] opined that the report was atypically short for this type of case and that the investigative efforts of the Sheriff's office were far below the standard of care, noting that the loss of the dental evidence was especially egregious. The Sheriff's Office informed [REDACTED] [REDACTED] that the case was closed and they expended no further efforts or resources regarding these unidentified human remains. [REDACTED] and the Sheriff's Office agreed to request the assistance of the Colorado Bureau of Investigation to collect the remains still on scene.

[REDACTED] contacted [REDACTED] [REDACTED], who stated that he was not contacted about these remains until *after* they were collected and removed from the scene. He was certain that he received the remains directly from Deputy Schultz, not Sheriff Sanchez. The Coroner's Office was in possession of the bones collected by the Sheriff office in October, 2024. The bag used for collection appeared to be a used paper grocery bag, not a forensic evidence bag. It had no markings or labelling describing the items, the date or location of collection, the identity of the collector, or the chain of custody related to the evidence, and had no tape or seals to protect the integrity of the evidence. Inside the bag was a skull matching the photos taken on Wild Horse Mesa, but the teeth with dental work were missing and no other remains were contained in the bag. [REDACTED] noted that the Coroner's office had at least one broken window, indicating that it was not a secure location. The remains were later transferred to the Alamosa County Coroner for secure storage and submitted for forensic anthropological analysis and autopsy.

Colorado Bureau of Investigations [REDACTED] testified before the Grand Jury. The evidence, including all exhibits admitted, and testimony from this witness during the grand jury session(s) established the following facts:

[REDACTED] testified regarding her background and experience in crime scene investigation and was offered as an expert in crime scene analysis.

She described CBI's role as an "at request" that assist local law enforcement agencies across Colorado with investigative resources, including crime scene analysis and evidence collection.

[REDACTED] testified regarding crime scene investigation best practices. She described that when CBI is requested to assist with crime scene analysis and evidence collection, they are usually a secondary responder as the requesting agency will have conducted the initial response. She testified that ideally, the requesting agency will have ensured that the crime scene is safe and secure and access is limited to ensure the integrity of the evidence. Thorough photographing of all items of possible evidence, in their original undisturbed state, is key to properly documenting a crime scene. Evidence collection should be done in a cautious and careful manner to avoid cross-contamination and ensure the integrity of the evidence. Individual items of evidence should be logged, bagged separately in evidence bags, labelled and documented as to location of collection and identity of collector, and sealed. Personal protective equipment, such as latex gloves, should be worn and changed for each item as it is collected to avoid cross-contamination. These are standard practices in law enforcement and all officers have been trained and tested on this process as part of their mandatory certification.

[REDACTED] then testified about the event related to this case. She noted that the scene had been monitored and secured with crime scene tape by the Colorado State Patrol between [REDACTED]'s viewing on August 18, 2024 and CBI's arrival on August 19, 2024. Several CBI agents conducted an initial search of the large area of recovery. The agents identified several items of human remains and clothing, including a distinctive necklace and pendant. The teeth documented by [REDACTED] were not found during the search. In order to ensure no items of evidence were missed, cadaver detection dogs were deployed, finding additional human remains. Once the known items were marked, CBI used a drone to photo document the area and the locations of items of evidence. The items of evidence were collected in the manner described above, with agents photographing, logging, bagging, sealing, and documenting each item of evidence in a forensically sound manner.

[REDACTED] testified that after collecting all the evidence, the items were transported to the Costilla County Coroner's Office, where they were transferred to [REDACTED] Mr. [REDACTED] presented the skull collected by the Costilla County Sheriff's Office in October 2024 to CBI agents; it was in the same condition as it was presented to him, i.e. in a used paper grocery bag with no markings, labelling, or sealing. CBI agents then properly collected, logged, labelled, bagged and sealed the skull and it was added to the other evidence collected from the scene.

[REDACTED] opined that a thorough investigation reflects care and respect for the deceased and their family. Conversely, a flippant investigation that lacks urgency and thoroughness

indicates that the deceased doesn't matter, and that such an investigation represents treatment of human remains that would offend normal family sensibilities.

██████████ testified before the Grand Jury. The evidence, including all exhibits admitted, and testimony from this witness during the grand jury session(s) established the following facts:

██████████ testified regarding his training, background, and experience in death investigation as a coroner. He described attending an intensive training program for coroners and have served as elected coroner for roughly three years.

██████████ described the role of the coroner in the legal system. He noted that the coroner is tasked with determining the cause and manner of death. He also described that the identification of unidentified human remains is part of the role of a coroner.

He described that a coroner must work closely and in cooperation with law enforcement as part of their respective investigations. Law enforcement has authority over the crime scene and must make a determination of whether the death occurred as part of a criminal act. The coroner has authority over the remains, i.e. the body, in order to investigate and determine the cause and manner of death and the identity of the deceased. The coroner and law enforcement will generally share information, reports, and photographs to assist each other's investigations. The coroner relies on law enforcement to collect evidence in a forensically sound manner in order to ensure the integrity and reliability of the evidence.

██████████ discussed the statutes that define these different duties and authorities. ██████████ discussed statutes that require law enforcement to contact the coroner immediately upon discovering human remains, whereupon the coroner is granted sole authority over the remains. ██████████ described a statute that clearly states the remains shall not be removed until the coroner has arrived on scene or given permission to remove the remains on their behalf. ██████████ testified that although the coroner may grant permission to law enforcement to collect the remains on the coroner's behalf, it is rare as the coroners generally want to go to the scene as part of their death investigation and collect the remains themselves. ██████████ testified that significant information can be gleaned from seeing the remains as they were found, and that evidence can be lost if the remains are disturbed or removed prior to the coroner's arrival. If law enforcement removes the remains without the permission of the coroner, ██████████ testified it would be a statutory violation.

██████████ testified regarding the remains collected in this case. He was not present at the scene and not involved until later in the investigation as he is not the coroner for Costilla County. He saw the skull collected by Costilla County Sheriff's office; it was in a used paper grocery bag and was not labelled, marked, or sealed properly and did not contain the teeth, which, if collected, would have provided important information in determining the identity of the decedent. In contrast, he described that the evidence collected by CBI was properly and professionally collected and that CBI's work on this case, which was very thorough and professional, represents care and respect for the decedent and their family.

██████████ opined that the actions of the Costilla County Sheriff's office, including collecting the evidence before the arrival and without the permission of the coroner, collecting the skull in an unprofessional and forensically unsound manner, failing to document or collect a large number of remains (causing some important items (such as the teeth) to be lost), the flippant treatment the skull by the Sheriff's office staff (losing track of its location, failing to document chain of custody), failure to write and finalize reports in a timely manner, and failure to provide ongoing cooperation to the coroner, caused harm to the coroner's investigation into the cause, manner, and identity of the deceased, violated the Sheriff's statutory duties and requirements, showed disrespect to the decedent and their family, and would outrage normal family sensibilities.

██████████ was asked about examples in which a law enforcement officer might be justified in collecting evidence prior to the coroner arriving or giving permission. He said there were times, such as where a forest fire was raging through an area close to the remains, that law enforcement might be justified in collecting remains without the coroner's presence or permission. ██████████ testified that he had read the reports and had been briefed on the circumstances of the case, and he opined that there were no exigent circumstances that justified the Costilla County Sheriff's office in collecting the skull without notifying the Coroner and receiving permission to do so.

██████████ again took the stand and discussed the body-worn camera video he took at the Coroner's office following CBI completion of the field search and crime scene analysis on August 19, 2025. He noted several key details, including 1) Costilla County ██████████ ██████████ stated he was certain he collected the bag with the skull directly from Deputy Schultz, 2) ██████████ ██████████ asked Deputy Schultz if they were going to continue to search the area for more remains and was surprised that nothing else was done by the Sheriff's office, and 3) Deputy Schultz contacted the coroner after he had already collected the skull from the scene.

AS TO COUNT ONE:

A TRUE BILL

██████████
Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT TWO:

A TRUE BILL

██████████
Foreperson

ANO TRUE BILL

Foreperson

AS TO COUNT THREE:
A TRUE BILL

[Redacted]

Foreperson

ANO TRUE BILL

Foreperson

AS TO COUNT FOUR:
A TRUE BILL

[Redacted]

F

A NO TRUE BILL

Foreperson

AS TO COUNT FIVE:
A TRUE BILL

[Redacted]

Foreperson

ANO TRUE BILL

Foreperson

I, [Redacted], the Foreperson of the 2025-2026 12th Judicial District Grand Jury, do hereby swear and affirm that each and every True Bill returned in this indictment by the 2025-2026 12th Judicial District Grand Jury was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the 2025-2026 12th Judicial District Grand Jury. The 2025-2026 12th Judicial District Grand Jury further authorizes the District Attorney for the 12th Judicial District to return this indictment to open court with or without the presence of the foreperson.

[Redacted]

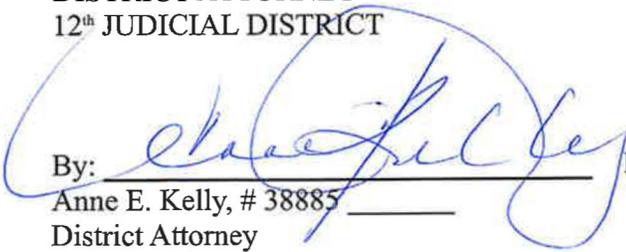
Foreperson

Subscribed to before me in the City and County of Alamosa, State of Colorado,
this 07th day of March, 2026

[Redacted]

My commission expires: [Redacted]

ANNE E. KELLY
DISTRICT ATTORNEY
12th JUDICIAL DISTRICT

By: 

Anne E. Kelly, # 38885
District Attorney
12th Judicial District

Date: 3/26/26

The 2025-2026 12th Judicial District Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 21st day of March/VCA, 2026

Pursuant to § 13-73-107, C.R.S., the Court designates Costilla County, Colorado as the county of venue for the purposes of trial.

Dated this 26th day of March-AXSM, 2026

Judge

