DISTRICT COURT, ARAPAHOE COUNTY, COLORADO Case No.

DATE FILED: March 20, 2023 8:30 AM

#### ARREST WARRANT

People of the State of Colorado to all peace officers in the state, Greetings:

A complaint in writing, under oath, has been made, and it appears that there are reasonable grounds for believing that between March 6th, 2023 through March 15<sup>th</sup>, 2023, at 6795 S. Robertsdale Way, in the City of Aurora, in Arapahoe County and State of Colorado, James Toliver Craig, date of birth 02/11/78, Race: white, Gender: male, Height: 5'09", Weight: 185 pounds, Hair: blond, Eyes: blue;



did then and there:

commit the crime of 1<sup>st</sup>-degree Murder After Deliberation, as that crime is defined by C.R.S 18-3-102 (1)(a), respectively and as further set forth in the complaint attached hereto and made a part thereof.

You are therefore commanded to arrest **James Toliver Craig, date of birth 02/11/78**, and bring him before the nearest available District Court without unnecessary delay, to be dealt with according to law.

Issued this <u>18th</u> day of <u>March</u>	, 2023.
DESCRIPTION: Address: 6795 S. Robertsdale Way City: Aurora	
45 W 5'9" 185  Age Race Height Weight  Others:	Bail set in the amount of \$ No bond hold.
Richard Ferro	
XXXXXX/District Court Magistrate – Printed	
Richard Hayes Ferro	

Judge/District Court Magistrate – Signature
DISTRICT COURT, ARAPAHOE COUNTY, COLORADO
Case No.

#### AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WARRANT

I, Detective Bobbi Olson, of lawful age and being first sworn upon oath, state that I have probable cause for believing that:

Defendant, James Toliver Craig, date of birth 02/11/78, Race: white, Gender: male, Height: 5'09", Weight: 185 pounds, Hair: blond, Eyes: blue;



did commit the crime(s) of:

## 1. C.R.S. 18-3-102 (1)(a) Charge - 1st-degree Murder After Deliberation - Class- F1

Your Affiant, Bobbi Olson, is a Police Detective with the City of Aurora Police Department and has been employed since July 2013. Your affiant was previously a licensed peace officer in Minnesota from 2004 to 2013. Your affiant has authored numerous search and arrest warrants while participating in individual and organized crime-related investigations. Additionally, your affiant has conducted and supervised hundreds of investigations in both an overt and covert capacity.

Your affiant is currently assigned as a Detective with the Aurora Police Department Major Crime Homicide Unit (MCHU). Your affiant is responsible for investigating significant incidents of violent crime, focusing on homicides, attempt homicides, and officer-involved shootings. Your affiant has conducted numerous investigations in this capacity and routinely utilizes search warrants (for residences, vehicles, cellular call detail records, social media accounts, etc.) as an investigative tool, when appropriate.

As a Detective, your affiant is authorized to carry firearms, execute warrants, make arrests for offenses against the State of Colorado, as well as perform other duties as authorized by State and Federal law. Your affiant has completed thousands of hours of training over her career, beginning with a basic police academy. In addition, your affiant received a bachelor's degree in criminal justice

from Metropolitan State University. The facts below are based on personal knowledge and/or interviews with witnesses and fellow officers and/or review of official law enforcement reports.

On March 15, 2023, at approximately 11:08 a.m., victim Angela Craig (DOB: 04/15/1979) presented herself to University Hospital because she had a severe headache and was experiencing dizziness.

Angela was accompanied by her brother Least DOB: 02/11/1978). At approximately 2:00 p.m., 84651, and later met by her husband, James Craig (DOB: 02/11/1978). At approximately 2:00 p.m., Angela experienced a seizure and began to rapidly declined medically. Eventually she was placed or life support in the Intensive Care Unit. Hospital medical personnel could not find a known medical condition that would have caused Angela's rapid medical decline.	า
Your affiant was told James was a dentist who worked at the Summerbrook Dental Group. James was business partners with also a dentist. Ryan and his wife, (DOB: 06/22/1970), are friends with James and Angela.	as
On March 15, 2023, James communicated with via text message from his cellphone and informed that Angela had been admitted to University Hospital and her condition was grave. And they both responded to University Hospital. At the hospital, spoke with one of the attending nurses regarding his suspicion that Angela was the possible victim of poisoning. Explained to the nurse that James recently ordered Potassium Cyanide for their dental practice, adding that there was no medical reason or purpose to order Potassium Cyanide for a dental practice. As a mandatory reporter, the nurse called the police, and a investigation ensued.	n
The Major Crime Homicide Unit was contacted and took over the investigation.	
On March 16, 2023, in the early morning hours, your affiant spoke with at the Aurora Police Department Headquarters, where they had volunteered to talk with your affian	nt.
began by saying he and James have been business partners since August of 2022 when Ryan acquired James's dental practice, which had been struggling financially. Stated although he recently took over James's dental practice, they have known each other for over 20 years and went to dental school together. described James as a risk taker and found out he had filed for bankruptcy in 2021 and was on the verge of bankruptcy again. Iso stated that in January, James confided in telling him that he and Angela were having marital problems.	
On March 15, 2023, Office Manager, contacted wia phone a he was driving to University Hospital to be with James	as

hat on March 6, 2023, the day Angela first became sick, and went to Parker Adventist, she was working late at the dental office. aid James returned to the office after bserved James at an exam room computer with the lights off doing something on the computer. This was odd because James had his own office with his own computer and personal laptop he regularly took to and from the office. aid approximately 30 minutes after James left the dental office, he texted that he would be receiving a personal package and told her not to open it. stated that a package arrived for James on Monday, March 13, 2023. ound that the package box had been opened. Caitlin said she found out that another employee opened the package. Forgetting that James was getting a package, she looked inside the package. aid she saw a bio-hazard sticker and what said "Potassium Cyanide" on a Inside the package, realized that was the package for James. sealed the package back up circular canister. and gave it to James. said she later Googled what Potassium Cyanide was used for and saw that Angela had the same symptoms. Caitlin called Jacqueline when she heard Angela was back in the hospital on March 15, 2023, and told her about the contents of the package. arrived at University Hospital in separate vehicles but entered the hospital together. Upon arriving, they spoke briefly to James, but he received a phone call from a doctor, so he stepped away. While James was on the phone, and nurse came out to speak with them. stated while James was on the phone, he pulled the nurse away and told the nurse about his concerns that Angela may have been poisoned with Potassium Cyanide. While at the hospital, observed James meeting with doctors about Angela's prognosis. observed James crying after the meeting. then left the hospital and returned to rehicle. received a call from James's personal cell phone. While in vehicle, phone ould hear the conversation. James told vehicle's Bluetooth so that connected to he had heard "some disturbing information" and then asked if he had said anything to the admitted that he talked to the hospital staff about this incident. hospital staff. that he was aware of the package that James had ordered. James replied that the package was a ring for Angela and that he wanted to surprise her. countered by telling James he knew it was not a ring. James claimed the package was never opened, so couldn't know what was in it. advised that the package was definitely opened, and it did not contain a ring. asked James why he would buy Potassium Cyanide. James eventually recanted and admitted the package contained Potassium Cyanide but claimed that Angela asked him to order it. James claimed that Angela couldn't order the Potassium Cyanide because she didn't have the proper credentials. James told he ordered the Potassium Cyanide, but he "didn't think she [Angela]

would actually take it." James described the situation as being similar to a game of "chicken." At that point, told James to stop talking and get a lawyer.

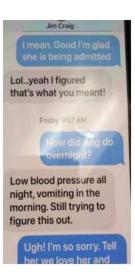
Your affiant and Detective Graw then interviewed Michelle, who provided a similar account of events as her husband, Ryan. cold your affiant that Angela had first become sick on March 6, 2023. Angela went to Parker Adventist Hospital and was released the same day. Angela reported she was dizzy and weak. stated Angela fell ill again and returned to Parker Adventist Hospital on March 9, 2023. Angela was admitted on March 9, 2023, and released on March 14, 2023. Medical personnel were unable to determine what was causing Angela to have her symptoms. stated that the next day, March 15 at approximately 11:00 a.m., Angela was brought to University Hospital by her brother

added that she had exchanged texts with James since Angela was admitted to Parker Adventist on March 9, 2023, trying to keep up to date with Angela's medical condition. stated she was a professor and had a Ph.D. in nursing, so she asked James to keep her updated on Angela's symptoms to potentially assist in diagnosing her. provided your affiant screenshots of the text exchange between her and James beginning March 9, 2023. Your affiant confirmed the contact "Jim Craig" in cell phone was James's phone number,

Your affiant reviewed the text messages. The blue boxes outline tatements, and the white boxes outline James's responses in reference to Angela's medical conditions.









having any answers. I get pretty nervous. They did so many tests. They have done four or five different blood draws, the regular blood panels all come back, OK, and she is negative for autoimmune disorders, negative for diabetes, her A1c was 5.5, the main issue they seem to be concerned about right now is blood pressure. They dumped 5 L into her IV over 24 hours and she

looks super puffy and swollen, but her blood pressure is barely 100/60. Yesterday morning it was 56/44 So, although that is the main concern that the doctors have, my main concern is just how she's feeling. Really pretty crappy. They are going to keep her one more night and hopefully she can come home tomorrow sometime.

Jim Craig

I'm sure she is miser-able and this has had to be so frightening fo

Her BUN urea nitrogen was 29 yesterday, but today it's back down in the normal range of 21. They think she was just dehydrated. Her kidneys seem to be doing well so far, I

thought it might be adrenal insufficiency, but they tested for that too and so far just no answers.

Low BP would cause her to be lethargic, and slur her speech.

I'm glad she doesn't have those disease processes but any answer would help ease

anxiety and have a plan.

terrifying..., in my opin

I'm sure everyone is thinking of every pathophysiologic process that affects blood pressure

They did an MRI of her

head because brain tumors are in the family, they did an ultrasound of her heart, they did a head CT and they did a chest and abdomen CT and everything has come back negative so far so I guess that's good? No tumor is a good thing, right?

> Yes, that is a good thing. I'm glad they ruled it

Jim Craig

Especially with a fami-ly history.

ine she was so dehy-drated to cause so low

I'm sure she is puff with 5L of fluid on

And I'm sure her kidneys were working double time to process it.

I'm glad her A1c was

Jim Craig neys were working double time to process it.

I'm glad her A1c was normal. I would have sworn she was having diabetic keto acidosis but I couldn't imagine that they wouldn't have checked a blood sugar on the tirs! ED sugar on the first ER

I will continue to pray for answers.

I know you have

Jim Craig I know you have amazing support but please let us know

They did check blood sugar on the very first ER visit. She was 195 and she was throwing glucose in her urine. That was Monday. So they were almost sure that it was diabetes. But then when we went back again yesterday, day checked on her blood sugar was lower, but still high like 145 but there Jim Craig

high like 145, but there was no glucose in her urine at all. And then her A1c came back at 5.5 so that was a mystery.

> So A1c is an averag of the last 90 or so glucose problem it won't necessarily

Yeah that's a good point. But no glucose in her urine today so

Jim Craig in her urine today so there's that.

But has she been ea ing much since Mon

Let's see... A little bit, but not very much. Today the only thing that she has had is one cracker and she threw it up. Yesterday, the only thing she had was a protein shake in the morning which she threw up and some chicken noodle

soup for dinner, which she also threw up. So I see the point you're making... They may not be any sugar to throw into the urine!

> However her IV could have sugar in it. D5.LR with or without Or are they running NS?

Jim Craig

LR w/o K which also surprised me because her potassium and something else... Some other electrolyte, but I can't remember now what were both low today. They gave her potassium, supplements, orally, the first one she was able to take, the second one she threw

She's also on tramadol for her headaches and

they have her on 8 mg of Zofran every four hours I think. The next dose is due in about an hour and a half. Although this morning, her most violent vomiting episode happened about five minutes after they gave her IV Zofran, so that's weird.

5L is a lot to run with D5 so LR makes

That is strange be giv-

vomiting with a antiemetic and headaches would point that way.

If her K stays low and she continues to vomit I would expect they

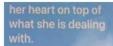
Jim Craig

If her K stays low and she continues to vomit I would expect they will add K to her IV

If it wasn't my wife, this would be kind of a fun puzzle to try to work out!

I'm surprised they haven't yet

> That's all we need is a low K to move her to electrical issues with



infectious process? Her WBC and leuko

I know they are smarter than me. Im just working through all the things in my mind.

### They haven't done a culture, but her WBC and leukocytes are normal. Oh! Her see reactive protein is super high though, Like 20. I think the high end of normal is 2.99.00 there's an inflammatory process somewhere.

Well that's huge and says there is something going on.

# Jim Craig

Ang's heart ultrasound was normal except for "unable to accurately measure pulmonary pressure due to insufficient tricuspid valve regurgitation envelope."

ment. So she is having tricuspid regurgitation to the point that her PA pressure can't be measured.

# Is that what that

means? Hmm

means the tricuspid value leaks and blood is able to go back into the right atrium. I would think that could affect pulmonary artery pressure.

Tricuspid regurgitation is usually associated with high PA pressure.

Jim Craig In reading I think an insufficient TVR envelope suggests pul-

From my nephew, has an internist:

monary hypertension usually involve breathing issues such as shortness of breath. She hasn't

that so not being able to accurately measure pulm pressure doesn't really matter much at this point.

With such a low blood pressure maybe it throws off the ability to get a reading.

Saturday 12:46 PM

Any news today?

Jim Craig

The doc is going to do some imaging of her gallbladder, and some other internal organs to see how they look. Still pretty much the same though. When I talk to her, she seems like she's in a ton of pain and super super tired.

Of course, all of the tests are coming back perfect.

Jim Craig cause yet. We will keep praying for answers and for Tuesday 6:34 AM

Not really, no answers. She's on oxygen full time now.

That must be so frustrating for everyone.

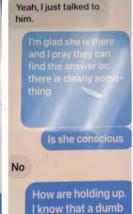
is she home or still ad-mitted? Still admitted Yesterday 12:07 PM

Thanks Michelle, She's at University Hospital, so maybe another set of eyes on this case will help?

I think Ryan is trying to get ahold of you

Symptoms of pulbeen experiencing

Jim Craig



question.

She's not laughing at any of my jokes either, so you know it's really bad. That's distressing Bc you are funny

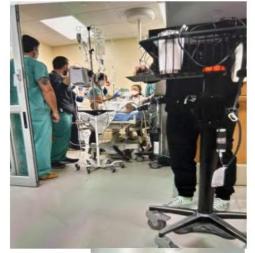
Honestly, I haven't really told the kids how bad it is right now. I

don't really have any information to tell them and I don't want to scare them needlessly. Nora and Violet are at the zoo with friends. The other kids know that she went back to the hospital, but they are just doing school and stuff.

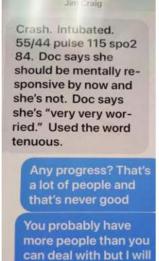
That's smart.



James then texted I two pictures:







come and just sit



The text messages noting the day "Friday" was March 10, 2023. The text message noting "yesterday" was on March 15, 2023.

contacted your affiant on March 15, 2023, at approximately 9:00 a.m. stated James called however, he did not answer. then received the following text message from James:

Jim Craig

Today 8:36 AM

now.

Recents

+1 (303) 381-9564
Scam Likely
9:52 AM

Merrill
mobile
9:41 AM

Jim Craig
mobile
mobile
i

Good morning Thank you for taking my patient load today. I want to make an urgent plea to you. If we were ever friends, please do this favor for me. Please don't talk to anyone about what we talked about last night, including any law enforcement officers. You are under no obligation to answer their questions unless you are served a subpoena and you will do more damage than good to my family by continuing to insert yourself into this. Angela is gone and I am devastated. There is nothing that can bring her back and I want desperately to tell you all Of the details so that you can better understand what's gone on behind the scenes with her. There is so, so much that you don't know that I wish you did. If you knew everything this would make so much sense to you but there's no use in telling you right

You and I have a history of you and the other partners and Jackie all Talking about me behind my back and deciding what you think is best and then you're always the fall guy that has pull the trigger or tell me what you've all decided about me. I'm fact, yesterday you didn't even come to me. I had to seek you out. You have never given me the advantage of talking with me first-you just decide and then act and hope I'll pick up the pieces later. This is a pattern in our business dealings and now has become a factor in our personal dealings.

Jim Craig

Let me paint a picture for you of what this has done. Yesterday I had to tell my kids their mom was not going to wake up and they were there to say their final goodbyes. That was at 6:45pm. The hospital said we could bring the kids up to say goodbye at

the kids up to say goodbye at that time, but because of the investigation you opened by your incomplete information, the hospital made those Poor, grieving, hysterical kids wait until after 10:00 to see their mom. After an hour or so of saying goodbye to her, we went home just before midnight only to have our house sealed against our entry by the police. Instead of getting to go home and find comfort, they were met with flashing lights and cold. unfeeling cops and the kids, scared and confused, had to Go sleep at the home of a ward member. Family is starting to come in to town today and I have to tell them they can't come to my house and try to explain why. I have to hire a homicide attorney to make sure I don't end up being painted in the light that you know some hungry DA is anxious to paint me in because I am most likely going to be charged even though that is

8:54 AM

Jim Craig
charged even though that is absolutely NOT what happened.

Ryan, I understand why you did what you did. I do. I get it. But if you had come to me personally, man-to-man instead of talking to everyone else about what you thought you knew, I might have let you in on some details that would have made you less likely to cause this horrible storm. Man Ryan, If you had ONLY put me higher on your list of priorities instead of putting everyone else's opinions and gossip ahead of me! For that I am very, very mad at you. I have talked to you about this multiple times but you don't seem to care and now what you thought was responsible has become reckless and so, so destructive.

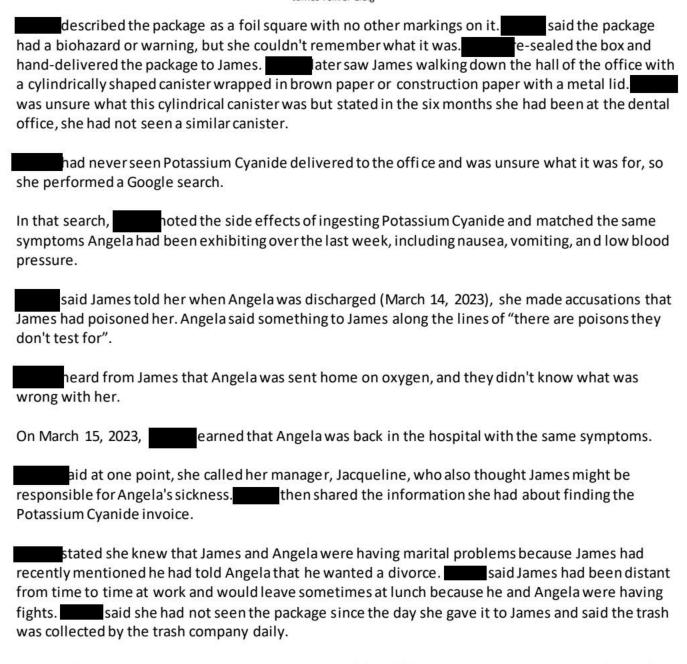
And so I'm asking, if there was ever any love in your heart for me, please don't make this any worse by talking to any officers or anyone else about this unless you are legally forced to. And whoever else on the team you think is going to be questioned, I would ask that you privately ask them to honor this request, too.

Also, please do not respond to this text message until I text you again.

Aurora Police Department Major Crimes Homicide Detective Chamberlin responded to University Hospital On March 16, 2023, at approximately 12:30 a.m., to speak with attending Hospital Staff. Detective Chamberlin learned that Angela arrived at University Hospital at approximately 11:00 a.m.

At approximately 2:00 p.m., Angela began suffering from a serious seizure, and doctors struggled to intubate her. Angela suffered from a lack of oxygen, had no pupil reaction, and began to have increased inner cranial pressure, which caused decreased perfusion pressure, and was sent to the intensive care unit. Detective Chamberlin learned that Angela was still on life support, had no brain activity, and her prognosis was poor, that she may not make it through the evening.

vas contacted and asked if she would respond to the Aurora Police Department to speak with detectives. In summary, stated she had been the Office Manager for the dentist's office for approximately six months and worked for James at Summerbrook Dental. Although is also a dentist, he does not work at that dental clinic but is a partner in the business.
knew that on March 6, 2023, James and his wife, Angela, worked out in the morning. Before the workout, James made Angela a protein shake or pre-workout shake in which James gave her extra protein because she was feeling sluggish. After the workout, Angela became faint and dizzy, and ultimately James took Angela to the hospital.
also started to notice odd or strange things around the office. On March 6, towards the end of the day, she found James in the dentist's office, in a back medical area which she referred to as exam room #9. She thought this was strange because James had his computer in his office, and his wife had just been discharged from the hospital.
confirmed it was not common for James to use the computer in the exam room, specifically number 9, because he had his own computer in the office and a laptop that he took home with him. left a short time later and James remained in the office. Approximately 30 minutes later, James sent her a text message saying he had a personal package coming to the office to let her know when it came.
During this time frame, Angela became ill and was taken to the hospital, where she was constantly throwing up, it was unclear what her diagnosis was, and James had said Angela's blood pressure was low.
During Angela's time in the hospital, James had conversations with where he told her he didn't think his wife was going to "make it." In the same conversation, James asked about business in the office. Found it strange James was concerned about his dental practice when his wife was a in dire medical condition.
On March 13, 2023, aid one of the office attendants opened a package that came into the office. This package was addressed directly to James. She knew this to be the personal package James had been asking about. This attendant had already opened the package. Took the package from the office attendant, which she intended to put in James' office. As repackaged the box, she noticed a packing slip that read "Potassium Cyanide."



On March 16, 2023, Detective Merino was contacted by Child Protective Services Case Worker Sidney Romero, who met with the members of the Craig family (James Craig and his children) individually. In her conversation with James, she believed James made some concerning statements. Namely, James alleged that Angela was suicidal and had been for some time.

James claimed that he, personally, has had to revive Angela on several occasions over the last few months. James said he asked Angela for a divorce in December of 2022, and since that time, Angela's depression and suicidal ideations have increased.

James believed that Angela was intentionally overdosing on opioids and another unknown substance. James never reported any of these incidents, never sought medical attention for Angela during/after the alleged overdose attempts, and never sought professional counseling/therapy for Angela's depression and suicidal ideations.

James told Sidney he was sure that Angela's toxicology would come back positive for substances but said he did not know what kind.

Sidney felt compelled to report the following statements because none of Angela's children mentioned their mother's depression nor did they mention any alleged previous suicide attempts. Sidney believed that it was improbable that this type of event (overdose suicide attempt) could happen with no one inside the household, except James, being aware. Sidney provided her opinion that James was attempting to build a cover story for what really happened to Angela.

On March 16, 2023, Detective Merino communicated with a friend of the Craig family, informed Detective Merino that James was currently at her residence and intended
to spend the night with his children while he was waiting for his two oldest children to come in from
out of town. stated she resided at
be there through the morning.
On March 16, 2023, Detective Merino submitted three search warrant applications and affidavits to the 18th Judicial District Courts. One for James and Angela's home, the Summerbrook dental office, 14991 E. Hampden Avenue #370, and one for address, Detective Merino was sworn in by Magistrate Richard Ferro, who signed and issued all three search warrants.
issued all tillee search warrants.
On March 16, 2023, at approximately 8:30 a.m., Aurora Police Department Detective Graw and your affiant responded to where we spoke to James. James stated he did not wish to speak to us about his wife's medical status.

James was provided a copy of the signed search warrant requesting his cellular phone, Angela's cellular phone, his wallet, and his laptop.

James handed your affiant Angela's cell phone and provided the passcode. James then handed your affiant his cell phone, a light blue iPhone 14, and provided the passcode. James said the laptop that he used regularly was at his dental office. James provided your affiant with the laptop's password. James said he did not carry a wallet but kept his credit cards and ID in his phone case. Your affiant took pictures of the cards and his Colorado Driver's License and gave them back to James.

On March 16, 2023, at approximately 8:45 a.m., your affiant, along with other Major Crimes Homicide Detectives, responded to 6795 S. Robertsdale Way and executed the search warrant. Upon clearing the residence to ensure no one was inside, your affiant noted the house was affixed with both external and internal surveillance cameras.

After the residence was cleared, Aurora Police Department Detective Merino completed an amended search warrant to include the seizure and search of the external and internal surveillance equipment and recorded surveillance footage. The search warrant was signed by 18th Judicial District Magistrate, Heidi Kutcher.

During the search of the residence, multiple items believed to have information and or evidence related to this incident were located. The items collected from the residence were the following:

Multiple types of powder proteins.

Multiple workout-style shakers used to consume protein drinks or shakes.

A computer tablet.

Two different plastic Ziploc-style bags that both had white powdery substances in them (neither labeled what they are)

A water bottle located on the exercise bike in the main bedroom area.

While executing the search of the residence, we could not locate a hard drive or device that would obviously maintain data for a surveillance device. There was a security system affixed to the wall that could play the video (exterior only), but it was not something that would be easily unplugged to seize. It is believed that the surveillance information would most likely be maintained on devices such as a phone, tablet, or computer in a cloud-based system.

On March 16, 2023, at approximately 11:45 a.m., your affiant and other Major Crimes Homicide Detectives executed the search warrant at Summerbrook Dental, 14991 East Hampden Avenue, Suite 370 in Aurora, Colorado. The dental office was closed for business.

Upon entry to the business, multiple cameras affixed to the office walls were observed. The offices were clean and orderly. The information previously provided was that James had been in dental room 9, where he was on the computer there in the dark. Your affiant viewed the dental room and found it to be an open-style dental room allowing someone to see if a person were at the computer.

Each room had individual lights, but when not illuminated with overhead lights, the rooms were dark. Each exam room was identified by a silver metal-style number on the hallway walls next to the entrance of the room.

Exam room number 9 was found to be at the far end of the clinic's dead-end hallway. Your affiant collected the hard drive that was hooked up and connected to the monitor in exam room number 9. The hard drive was a Dell OptiPlex 3070. The drive had a Logitech USB plugged into the back. The hard drive was seized.

Your affiant located an office in the clinic's southeast corner containing two office desks. On the far desk (south), a laptop was observed. When the laptop screen was woken, it showed the last logged-in person was James. The password James provided for the laptop was entered to make sure that the laptop was his. The password activated the laptop and opened it. No further investigation into the laptop's contents was conducted. The laptop was collected and determined to be a Dell Precision 7750 (gray/silver in color). The series of characters on the back of it had ST:3QCFYD3 and EX:8123367351. James's laptop was seized.

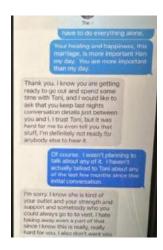
Aurora Police Department Detective Harris located a small hand vacuum in the office with three additional desks with computers. The vacuum had a white powdery substance inside of it. A portion of the substance was collected and seized. Detective Harris located James's DEA number #FC0032348 (United States Drug Enforcement Registration Number.)

Your affiant knows a DEA number is assigned to health care providers allowing them to write prescriptions.

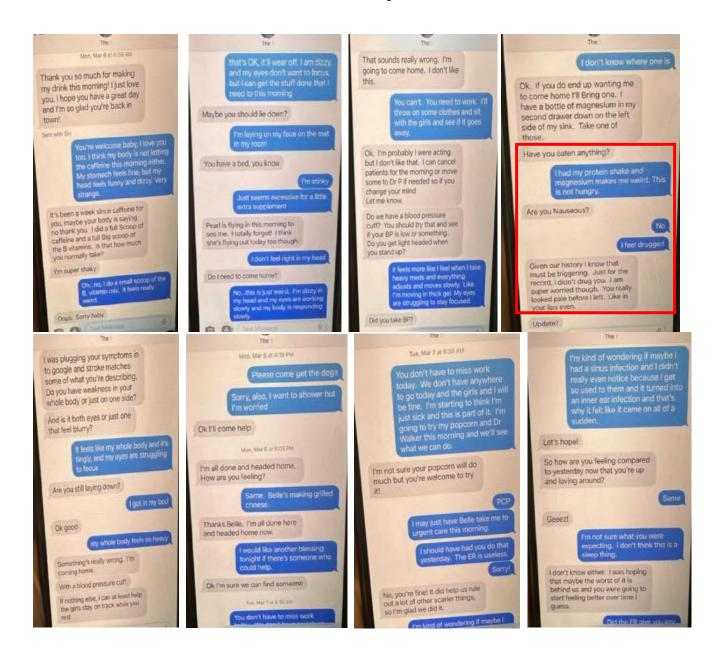
Your affiant accessed Angela's cell phone text messages and found several between her and James. Your affiant found Angela and James's text messages were comparable to other couples, texting about their day, the children's day, and their activities.

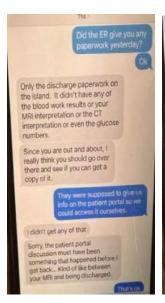
Your affiant found Angela had James in her phone as "The Boy" with a picture of the two of them and confirmed the phone number had matched that of the phone number Ryan and Michelle said was his.

While reading through the text messages on March 1, 2023, your affiant found Angela and James were discussing their relationship, mainly about James's healing and counseling. Your affiant noted the following text exchange: (Angela's text messages are in blue, and James's is in white.)

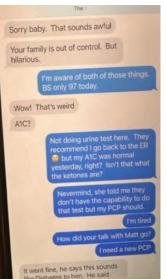


Your affiant noted James and Angela's text messages beginning on the morning of March 6, 2023, the first day she began to experience unexplained illness symptoms.





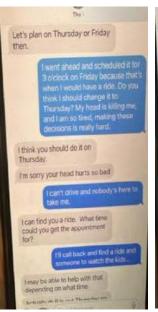


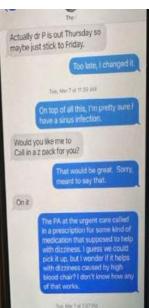


It went fine, he says this sounds like Diabetes to him. He said when your sugars are high the lens in your eye expands and makes it hard to focus. You can get mental confusion and become really tired and weak. And he said it would explain the audio disturbances you've had, too. He is really disappointing that the ER let you go without at least giving you some insulin. He said that we need to find you a PCP and call them and say that you are a new diabetic and you need to be seen sooner than later. He was hoping somebody could get you in as early as today or tomorrow.

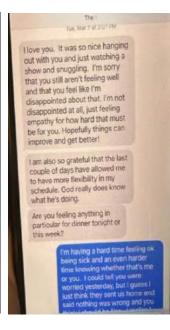
My doctor can get me in Thursday or Friday, but not before that. I don't want to be a new diabetic, so I would really rather not say those words, tell Matt to stick it.

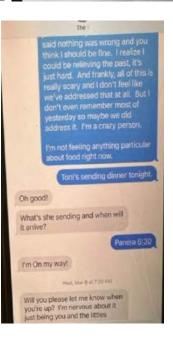
What should I do?



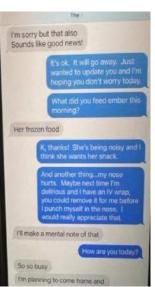


Sorry boby. That sounds awful.







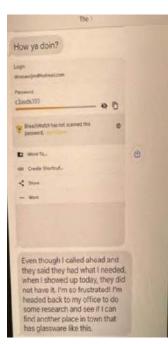






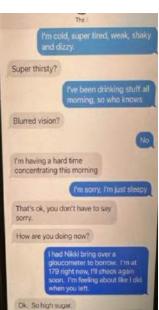






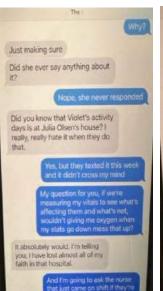






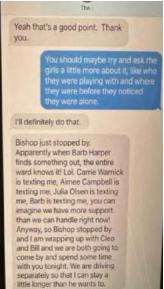






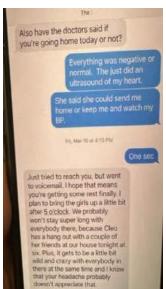


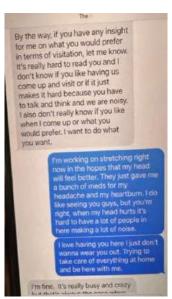




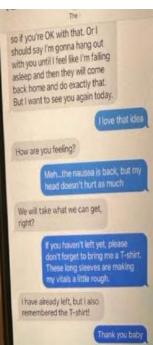




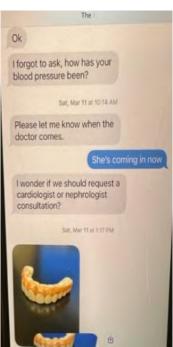




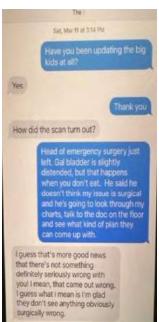








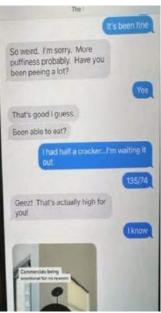






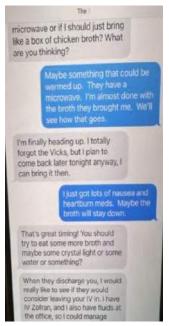


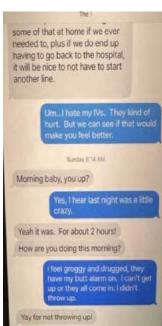








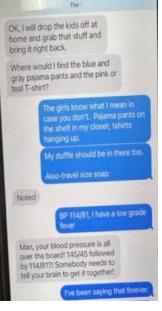


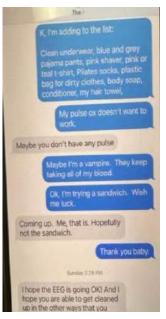




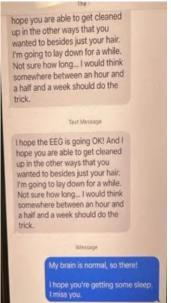


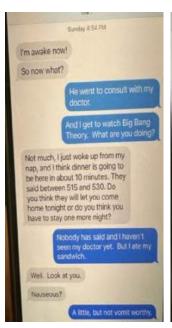






mind just isn't really in church









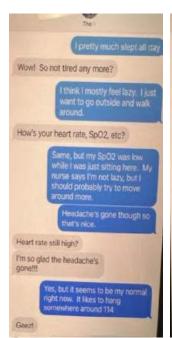


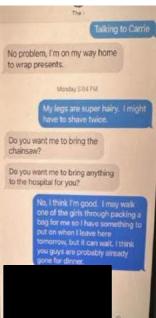
but when I got to your room and I totally forgot all about it. Maybe tomorrow. Mark and Renee are still at Idaho Springs so they probably won't be here until close to midnight. I kind of gave them some preliminary instructions about what Nora and Violet will need in the morning, but I'm sure you might hear from them. Julia Olsen also said she might take the girls for a play date at her house tomorrow because I think Leah is on spring break this whole week. Anyway, I hope you sleep well and start to feel better and if I can't, we can make me again tonight. I just miss you and I want to be close to you. I love you so much. I'll talk to you soon I hope! Hove you too baby! Thank you for handling so much. Maybe someone will figure me out





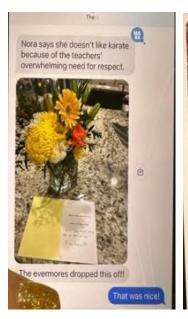
















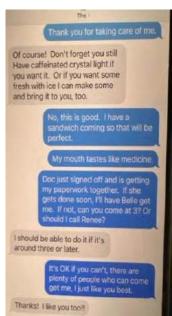
could just stay up here 24 seven

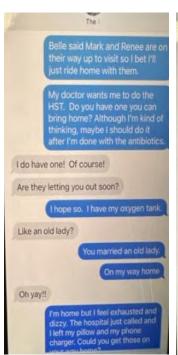














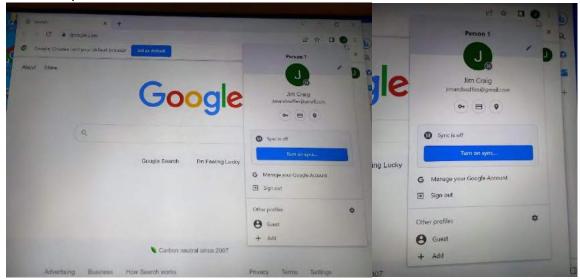




On March 16, 2023, Detective Harris was sworn in by Arapahoe County Honorable Magistrate Heidi Kutcher for multiple warrants. Detective Harris received signed warrants for James' blue iPhone 14 Plus, the hard drive collected from dental room 9 at Summerbrook Dental Office, James' laptop from the dental office, and James' IPad collected from the residence at 6795 South Robertsdale (James and Angie's residence).

The warrants permitted a search and download of the devices. The blue iPhone plus specifically requested a search from the dates of February 16 to March 16.

On March 17, 2023, due to the forensic detective being off work, an initial history search of the devices was conducted. Your Affiant and Detective Harris plugged the hard drive into a TV to look at the history of dental room number 9.

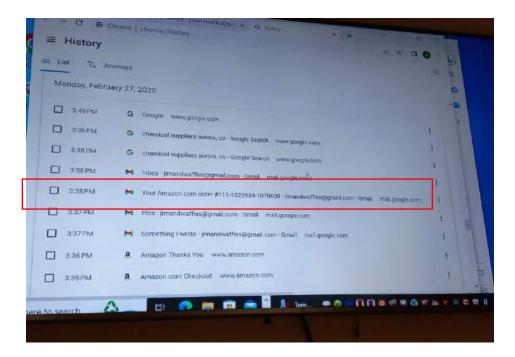


Detective Harris opened the Google Chrome page and saw the above depiction. Just below the x area of the webpage that you would click to exit the page was a J. When the J was selected, it provided a possible additional email account of James'. The known email on his phone was Dinosaurjim@me.com. This new email was jimandwaffles@gmail.com.

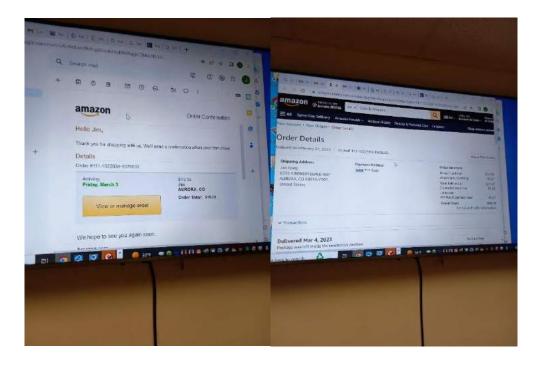
Detective Harris then clicked on the three small dots to the right of the J and clicked on the history. The history of the email account began on February 27<sup>th</sup>, 2023. This appeared to indicate that the email address was created on that date. Beginning on February 27<sup>th</sup>, 2023, we observed that the user had conducted searches related to poison. Those searches included "how many grams of pure arsenic will kill a human" and "Is Arsenic Detectable in Autopsy?"

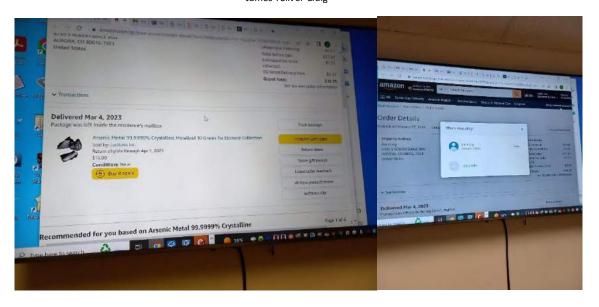
See below.

The first screenshot on February 27 provided the following history:



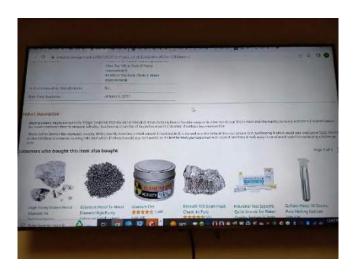
James had searched chemical suppliers in Aurora, Colorado and also had a made a purchase via Amazon. We clicked on the Amazon order and found the following:





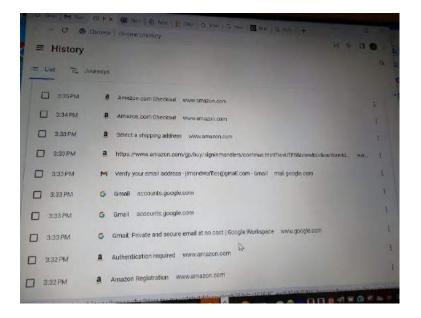
The Amazon order number in the email #111-1022934-1078630 was then clicked on, and the Amazon account pulled up an order. The item was ordered on February 27, 2023, and delivered to 6795 South Robertsdale Way in Aurora, Colorado (James' address) and left in the mailbox on March 4, 2023.

The item ordered was Arsenic Metal 99.9999% Crystalline Metalloid 10 grams for Element Collection. It cost \$13.00.

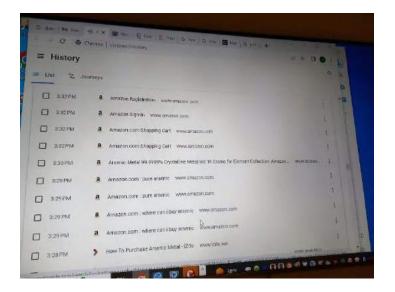


In the description of the item James purchased, the information stated that arsenic is often believed to be used for murder, as it has been in many crime novels. The second portion of the informative description stated that "the real danger is in swallowing it, which could very well prove fatal."

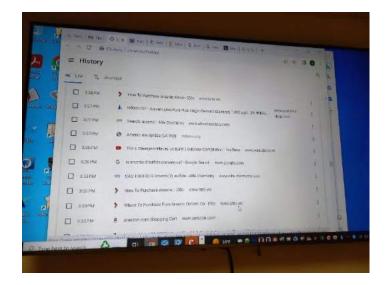
The next screenshot showed the following history from 3:32 p.m to 3:35 p.m:



The next screenshot shows the search history from 3:28 pm to 3:32 pm:

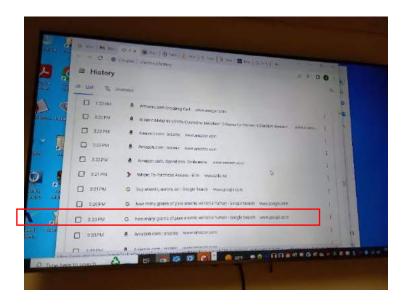


The next screenshot show the search history from 3:22 pm to 3:28 pm:



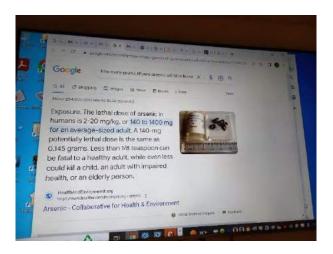
James searched Arsenic on the Alfa Chemistry website that provided many variations of arsenic.

The next screenshot from 3:20 pm to 3:22 pm provided the following:

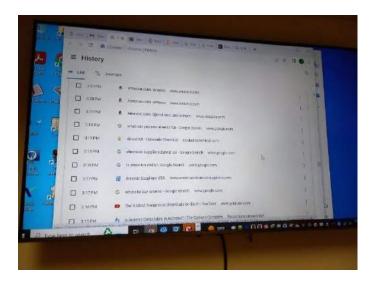


This particular search had a Google search of "how many grams of pure arsenic will kill a human."

When that link is clicked, there is information of what could be an exposure or lethal dose:



The next screenshot from 3:15 pm to 3:20 pm provided the following:

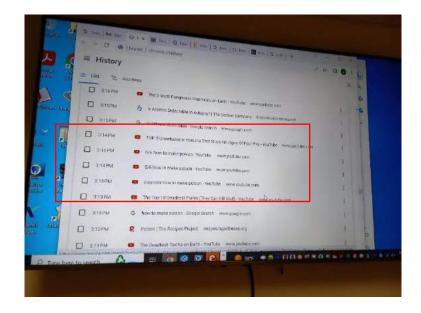


The bottom of this screen shot shows a search of "Is Arsenic Detectable in Autopsy? from The Carlson Company." When the website is checked for The Carlson Company, the following can be found:





The next screenshot from 3:11 pm to 3:16 pm provided the following:



The search history provided YouTube searches for "Top 5 Undetectable Poisons That Show No Signs of Foul Play", "how to make poison", and "The Top 10 Deadliest Plants (They Can Kill You)."



The top 5 undetectable poisons showing no signs of foul play is a video by ItsAllViral (above). The video provides the top 5 undetectable poisons and how they affect certain people. The following information is a synopsis of what was provided:

Polonium- an ex-Russian spy killed by this in a teacup. The item is said to be so dangerous that one gram could kill 1.5 million people in a few months.

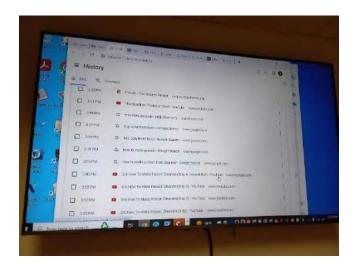
Mercury- Amadeus Mozart was killed by lethal Mercury pills. There are three forms of that can be ingested, inhaled, and consuming it.

Cyanide-found in countless items in the home and other locations. 1.5 milligrams per kilogram of body weight is a fatal dose for humans.

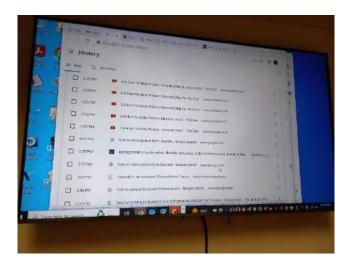
Botulinum Toxin- if not treated immediately, leads to paralysis. If not treated right away can lead to death.

Arsenic-virtually undetectable besides the Marsh test. Used in murder and mystery.

The following screenshot from 3:02 pm to 3:12 pm provided the following:

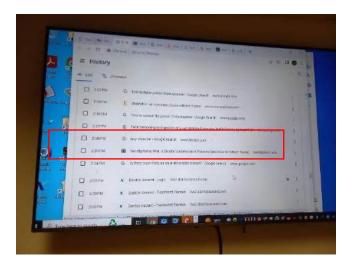


The screenshot from 2:39 pm to 3:02 pm provided the following:



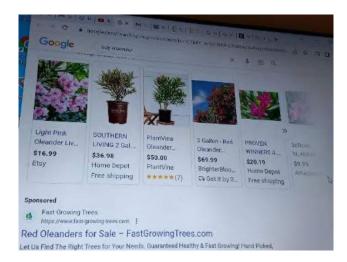
In this portion of search there is information regarding Oleandrin and how to make poison from Oleander.

The screenshot from 2:09 pm to 2:39 pm.

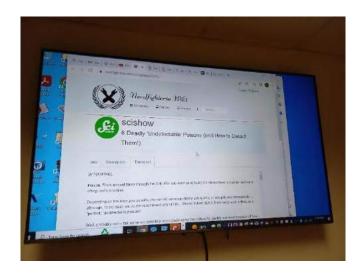


James had searched via Google "buy Oleander" and through Nerdfighteria Wiki, "6 Deadly 'Undetectable' Poisons (and How to Detect Them)."

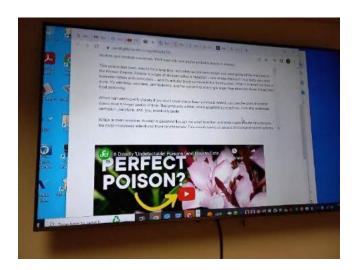
When you click on the "buy Oleander" you get a Google search for the plant.



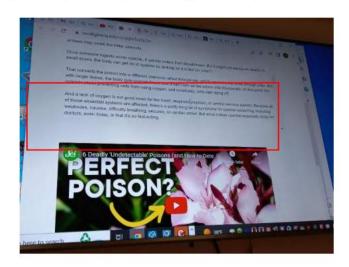
The Nerfighteria Wiki described multiple poisons in the text as well as had a video of the "Perfect Poison." The site provides the following information:



Within the text of the information the following is provided about Arsenic/Cyanide:

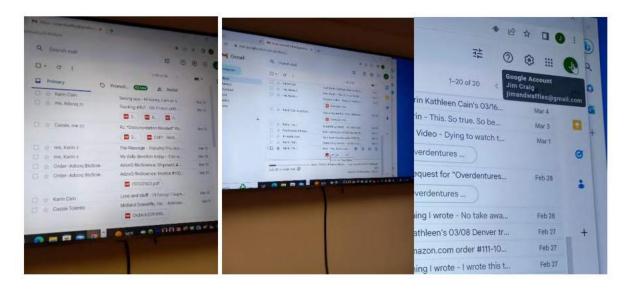


The article is somewhat lengthy but has information on some of the symptoms of Cyanide. The symptoms are weakness, nausea, difficulty breathing, seizures, or cardiac arrest.



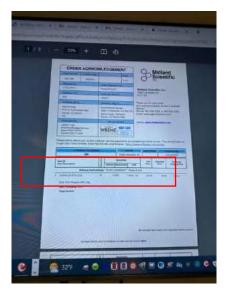
The video explained that Cyanide is very hard to detect and that it is often too late by the time doctors can diagnose what happened.

This concluded the search history on this date and anything related to poisons. When we clicked on the Amazon order, we could view the emails from the jimandwaffles@gmail.com account. Once we took a closer look at this account, we found additional purchases of poison. The account's first contacts were on February 27, 2023, and it appeared the account had just been created. The account had the following contacts:

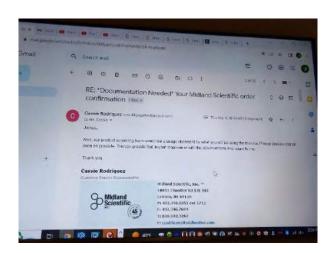


The emails ended on March 16, 2023, and started on February 27, 2023. The emails also have a J in the top right portion and when clicked it shows that it belongs to Jim Craig. The emails had multiple orders within the contents as well as communications with a

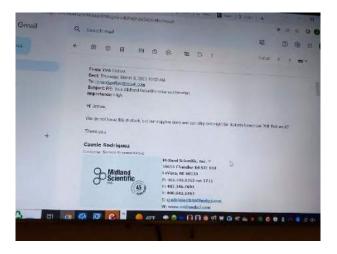
Within the contents of the emails there is an order on March 9, 2023, from Midland Scientific.



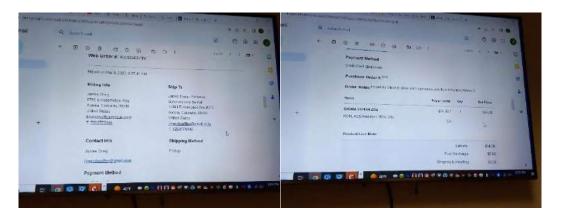
The item purchased was a Sigma 207810-25G. After the item was purchased, Midland Scientific employee Cassie Rodriguez contacted James about some follow-up needs for the product. In researching what Sigma 207810-25G was, we discovered that it is the technical term for potassium cyanide. The following email strand between James and employee Cassie Rodriguez took place:



The initial response from the company stated they would need a usage statement for what James needed the product for.

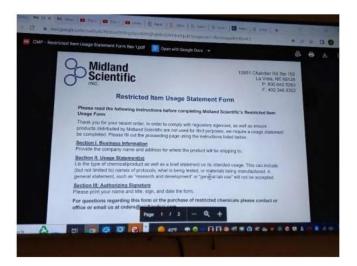


Cassie informed James that they did not have the item in stock but that they could ship the item overnight. The web order copy was provided and showed that it would be shipped to James' office.

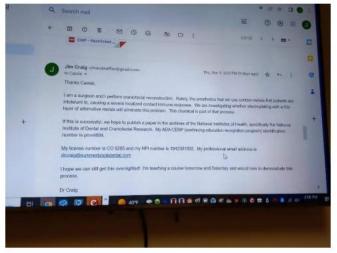


The order notes state, "Hopefully this is in stock and I can come pick it up tomorrow, March 9." It appeared that based on the order, James needed this product right away.

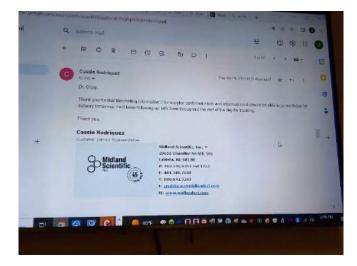
The email then provided a pdf from the company of the Restricted Item Usage Statement Form.



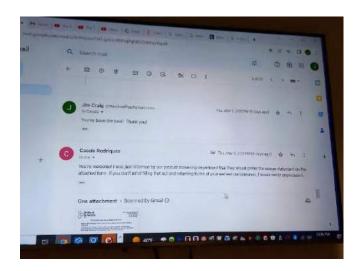
The form provided the details needed to be filled out by James for his purchase of the specific product of Sigma.



James responded by stating he was a surgeon performing a craniofacial reconstruction. James said he is using this chemical to check and see if it will help with the layering of alternative metals. He stated that if successful, this will be published as a paper in the National Institutes of Health. He stated his license number is CO 9285, and his professional email is drcraig@summerbrookdental.com. The email he is communicating on to buy the poisons, and with is the jimandwaffles@gmail.com. At no time is James using his professional email, to your affiant's knowledge, to make these purchases after alleging they are for work.

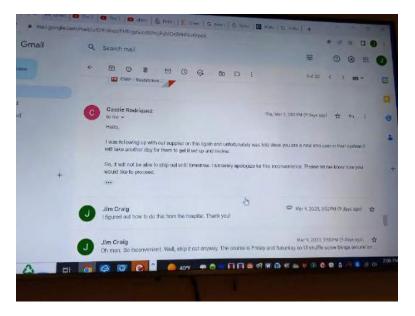


Cassie then responded stating the delivery was expected for tomorrow and the email is on March 9.

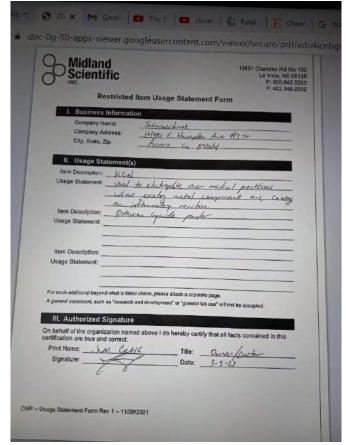


James tells Cassie she has been helpful and then she tells him that there is a preferred form for the

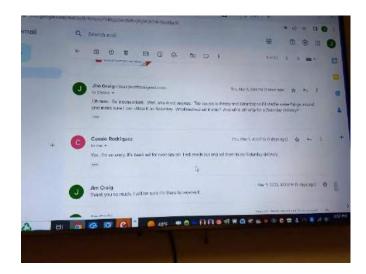
product.



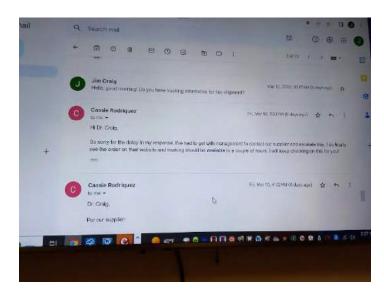
Cassie responded and stated that because James was a new user that the system would take longer to process the order. James responded that he figured it out (refencing the form and sent it from the hospital). He sent the following response:



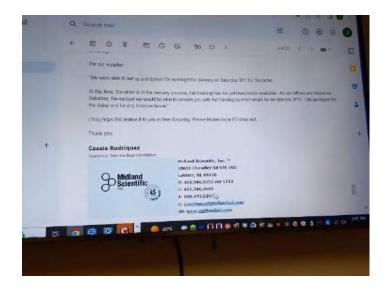
The response is the restricted usage form and he stated it would be used for electroplating over medical prosthesis. He signed the form and dated it March 9, 2023.



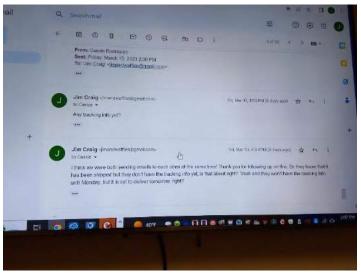
James then responded to Cassie's message about the delivery delay and stated it was inconvenient. He stated he will shuffle some things around and then get the delivery Friday, March 10.



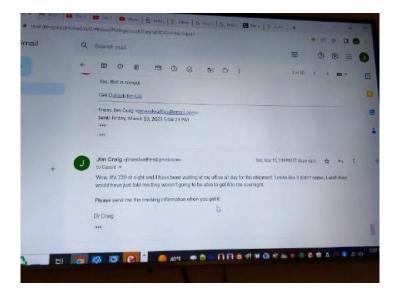
On March 10, 2023, James contacted Cassie to ask if she had shipment information.



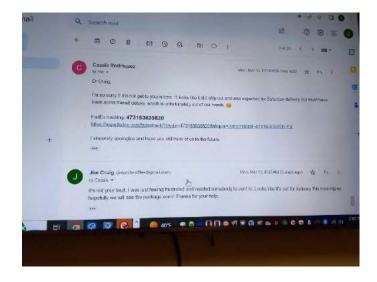
Cassie then sent a response from the supplier that the shipment is expected for Saturday March 11, 2023.



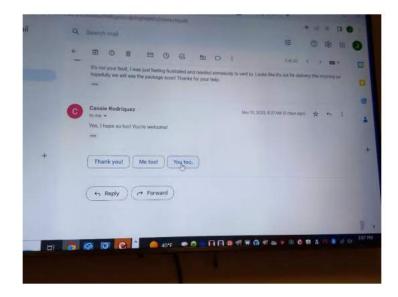
James again asked about tracking information.



James again contacted Cassie on March 11, 2023, and stated it was 7:30 p.m. He waited all day for the shipment at his office. James' office is only open Monday thru Thursday. James still had the shipment sent to his office on a day off. He had communicated with Caitlin that he had a "personal package" coming to the office and not to open it. It was believed that this package was the personal package.

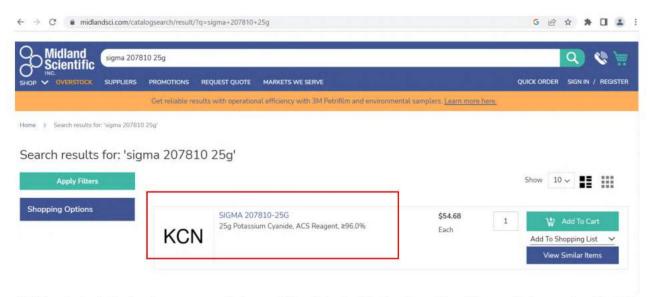


Cassie then responded on March 13, 2023. She provided a FedEx tracking number of 473183635820. Caitlin had told Your Affiant that the Potassium Cyanide had been shipped on March 13, 2023 to the office via FedEx.



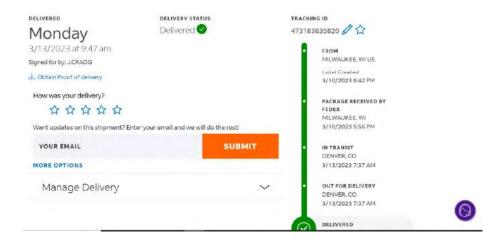
The conversations concluded with Cassie telling James he was welcome.

Your Affiant looked up the Sigma product on Midland Scientific's we bsite and found the following:



Caitlin stated she had seen a container with a label of Potassium Cyanide on it. James had told her not to open the box, but had gotten to it first, and the box was opened with the Potassium Cyanide inside. James had alleged to Cassie via email that this was for work but told his employees it was a personal purchase.

Your Affiant checked FedEx for the tracking number associated and found the following:

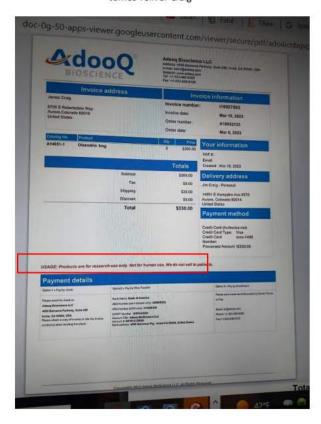


The item stated it was delivered on March 13, 2023, which was consistent with what Caitlin had provided detectives.

There was another purchase made by James on March 6, 2023, to AdooQ BioScience. The purchase was for 3 Oleandrin 1mg items for \$330.00. The invoice date was March 10, 2023. On the form, the usage stated the following:

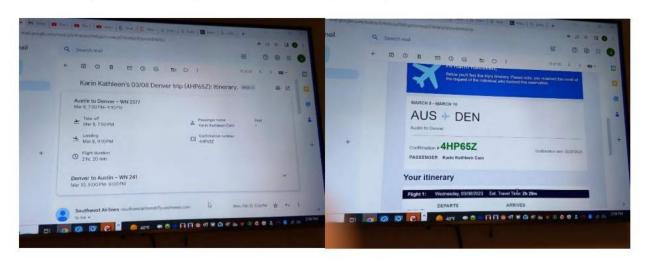
"Products are for research use only. Not for human use. We do not sell to patients."

See below.



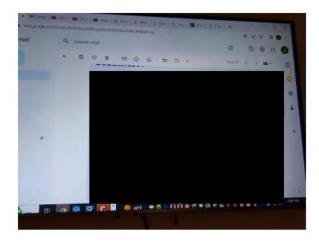
James never received this item because MCHU Investigator Josifek was able to contact FedEx and inform them of the situation. FedEx stated their interdiction team would stop the delivery of the package and hold it for Investigator Josifek to recover.

The emails were intimate in nature and contained sexually explicit conversations. There were also travel plans within those emails to travel travel dates were March 8-10, 2023, which showed travelling from Austin, Texas to Denver, Colorado. Angela was in the hospital during March 9-14, 2023. The email account appeared to have been created on February 27, 2023, along with the searches, plans to poison someone, and to convene with Karin.



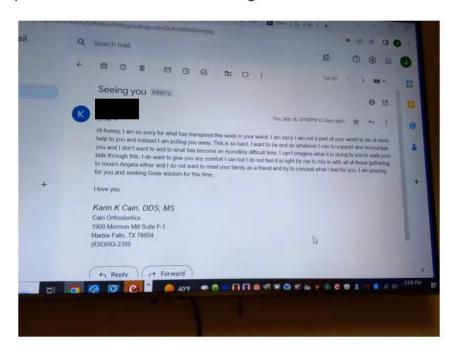
It appeared that James had visit him while his wife was in the hospital sick.

The second flight itinerary was for March 16-20, 2023. This flight was purchased on March 4, 2023, which was the same date that the arsenic was delivered to James' house.



A follow-up email from Karin on March 16, 2023, suggested that James had told her something had happened to Angela.

sent James an email explaining how sorry she was for him and that she wished she was helping him, not pulling him away. She stated she knew it had to be so hard what he was going through and that she wanted to be there for him but did not want to mix in with his family and friends and pretend to be only a friend when there was something more.



On March 17, 2023, your affiant spoke with Angela's stated that she and Angela spoke almost daily. Angela visited her in Utah from March 1 through March 5, 2023. While in Utah, Angela was neither sick nor complained of not feeling well.

with several women, told Angela he had been addicted to pornography since he was a teenager, and drugged Angela approximately five to six years ago. Angela told that James drugged her (an unknown drug) because he planned to go into their bathroom and give himself a lethal injection of something and commit suicide. James told Angela he drugged her so she wouldn't find him nor be able to save him, which would give the lethal drugs time to kill him.

Your affiant believed this is what James referred to in the text message exchange outlined in red earlier in this affidavit. "Given our history, I know that must be triggering. Just for the record, I didn't drug you".

Angela told several times over the past 16 years that she was going to leave James but said that James always convinced her to stay. Angela told that James had "run the dental office into the ground" and that their finances were dire. Angela complained to that James recently traveled to Las Vegas, where she said he gambled away over \$2,000.

When James updated on Angela's status, James said he would not allow hospital staff to conduct an autopsy. Toni said she pled with James, asking him to do an autopsy in case it was genetic, so they could prevent one of their children from getting sick. James said he felt if they couldn't figure out what was wrong with her when she was alive he wouldn't let them poke her more when she was dead.

On March 18, 2023, your affiant was advised Angela was pronounced brain dead at 4:29 p.m. by University Hospital Physician Natalie Held.

Colorado C.R.S. 12-240-140, determination of death, states that an individual is dead if:

- The individual has sustained irreversible cessation of circulatory and respiratory functions;
   or
- b. The individual has sustained irreversible cessation of all functions of the entire brain, including the brain stem.

Through the Centers for Disease Control and Prevention (CDC), your affiant learned that ingesting arsenic typically causes severe gastrointestinal signs and symptoms, such as vomiting, abdominal pain, and diarrhea. The signs and symptoms might lead rapidly to dehydration and shock. Different clinical manifestations might follow, including dysrhythmias (prolonged QT, T-wave changes), altered mental status, and multisystem organ failure that ultimately could result in death.

Through the CDC, your affiant learned that ingesting Cyanide typically causes chest pain, confusion, dizziness, eye pain, eye tearing, excitement, difficulty breathing, headache, nausea, rapid or slow heart rate, rapid or slow breathing, restlessness, shortness of breath, vomiting, weakness, or wheezing. In addition, more serious symptoms include high or low blood pressure, loss of consciousness, lung injury, seizures, coma, and death.

Angela told James she was having the following symptoms beginning on March 6, 2023, through March 15, 2023: dizziness, her head felt funny, her eyes did not want to focus and felt heavy and slow, felt drugged, whole body feeling tingly, extreme headache, eye discharge, altered mental state, high and low blood pressure, weak, shaky, tired, nausea, and vomiting.

Your affiant documented the litany of tests completed by two separate emergency department doctors through her text messages to James and James's messages to Michelle. None provided a medical reason for her symptoms. However, reading the CDC symptoms of the poisons, your affiant knows they are consistent with the symptoms Angela was experiencing and that ultimately killed her.

## Conclusion

Throughout this investigation, your affiant has spoken to numerous people who have provided insight into Angela and James Craig's relationship. Not one person has suggested or even seen any source of suicidal ideations from Angela. James had provided those statements to the Department of Human Services employees, who, after hearing those statements, felt that James was trying to make a point to have some source of the cover-up story to prevent his incrimination.

James has made varied statements to various audiences. He told the Department of Human Services that Angela was suicidal, and he had saved her many times but never reported it. James had told fellow employees that his marriage was failing, and he was in financial turmoil.

He has also been recently communicating with a woman named about what appears to be a sexually intimate relationship. It appears James was flying this woman into Denver while his wife and the mother of his children was dying in the hospital.

In totality, this investigation has proven that James has gone to great lengths to try and end his wife's life. On February 27, 2023, he created a new Gmail account jimandwaffles@gmail.com which he only used in dental room number 9 within his practice at 14991 East Hampden Avenue, Suite 370. This email account was not found on his cellular phone, his laptop, nor on Angela's phone. While using this account, he researched multiple "undetectable poisons" and eventually purchased Crystalline Metalloid Arsenic from Amazon.com. After buying this poison, he received an email from about her intention to fly to Denver, Colorado, for March 8-10, 2023.

On March 4, 2023, the arsenic was delivered to James' mailbox at his home residence. On March 4, 2023, James received another email from a trip that was scheduled for March 16-20, 2023, with a flight plan. On March 5, 2023, Angela returned home from a trip to Utah.

On March 6, 2023, Angela was admitted to Parker Adventist Hospital as she complained that her head felt funny, she was dizzy, and her eyes were not focusing. She continued that she did not feel right in her head and that her body was responding slowly. These symptoms were consistent with some of the symptoms from arsenic. These symptoms, per the CDC, were vomiting, abdominal pain, diarrhea, dehydration, altered mental state, or organ failure.

Angela was released from the hospital on March 6, 2023. James then ordered Oleandrin 1mg in the quantity of 3 on March 6, 2023. These items were intercepted by FedEx and were not delivered to James.

On March 8, 2023, according to the flight plans from February 27, 2023, came to Denver, Colorado. James then ordered Sigma 207810-25G (Potassium Cyanide) from Midland Scientific with a request to have the items overnight. He requested to pick them up on March 9, 2023, specifically. There were delays in the shipment due to verifying his credentials. James responded while Angela was in the hospital that he could complete the form and that the Potassium Cyanide was needed for surgery. James showed impatience in the email string between him and the Midland Scientific employee.

James then told his employee that he had a package coming to the office on March 13, 2023, and that the package was personal. That package was accidentally opened by an employee named and cook the package and repackaged it, knowing James requested it not be opened. As repackaged the item, she saw it was Potassium Cyanide. The packaged the item, she saw it was Potassium Cyanide within the business again. It should have remained in the business if it was truly used for a surgery, as James alleged.

On March 14, 2023, Angela was released from the hospital and returned home. On March 15, 2023, Angela returned to the hospital at approximately 11:00 am. This time Angela was at University Hospital Anschutz. Angela started to suffer from a severe seizure and was intubated. Angela suffered from a lack of oxygen and no pupil reaction and began to have inner cranial pressure. This led Angela to the Medical Intensive Care Unit, where she was on life support and did not regain brain activity. James was known to make Angela protein shakes regularly and had administered many to her. It was believed he had provided Angela with the poison through these shakes. Per the CDC, the more severe symptoms include high or low blood pressure, loss of consciousness, lung injury, seizures, coma, and death.

James has ordered multiple poisons that were not known to have been located during the searches of his residence or business. James has not attempted to speak with police regarding what occurred with his wife but has made statements that he had the answers to what happened. James has only repeatedly asked for his phone back.

Based on the totality of the investigation, James has shown the planning and intent to end his wife's life by searching for ways to kill someone undetected, providing her poisons that align with her hospitalized symptoms, and working on starting a new life with

more than enough preliminary evidence sufficient to arrest James Craig with premeditated first-degree murder.

Based upon the foregoing facts and circumstances, your affiant feels that she has probable cause to believe that the offense(s) of C.R.S. 18-3-102 (1)(a) Charge – Premeditated 1st-degree Murder Class – F1, has been committed and that Craig Toliver Craig, date of birth 02/11/78 did commit the offense.

I HAVE READ the foregoing statement, and the matters stated therein are true to the best to my knowledge and belief.

Bolu #310724	
Affiant – Detective Bobbi Olson	
SUBSCRIBED AND SWORNT TO before me this 18th day of March 2023. Issued at 11:21	PM
This Court, having reviewed the affidavit and application for arrest warrant and finds probable cause for the arrest of James Toliver Craig, date of birth 02/11/78.	
Ríchard Ferro	
ydge XDistrict Court Magistrate (signature)	
Richard Hayes Ferro	