

EAGLE

ARREST #

OBTS #

ARREST FORM

COMPLAINT AFFIDAVIT
PROBABLE CAUSE AFFIDAVIT CONTINUATION

Upon arrival on scene, Sergeant Luke Causey learned the following in regards to the incident: Approximately forty-five minutes earlier, Cody Reed Holland (DOB 08-16-1993) and Ashley Jean Loupe (DOB [redacted]) were traveling eastbound on I-70 near the Glenwood Canyon. Holland was operating a blue BMW sedan, bearing CA 5YMF893. At approximately mile marker 133, Holland and Loupe encountered a white Mitsubishi SUV. This vehicle, bearing CO 214 [redacted], was being operated by Manuel Jose Serrano-Lerma (DOB [redacted]) with passenger Chelsey Jacobs (DOB 06-20-1993). Holland and Lerma began an interaction described as "road rage" by Holland. Holland admitted "Wouldn't let him pass," referring to Lerma. Holland stated that he would parallel other vehicles on the roadway, preventing Lerma from passing. As the vehicles approached the 176 mile marker, Holland stated he could see Lerma brandishing a weapon in his side view mirror. Holland stated that on at least one occasion, Lerma was in the adjacent lane and he could visually observe the handgun to be a "silver revolver." As Holland and Lerma approached the 178 to 179 mile marker area Lerma fired one round from the handgun. Holland stated that when Lerma fired the round, Holland was traveling in the fast lane and Lerma was in the slow lane. Lerma's vehicle was positioned slightly back from Holland's vehicle such that the front bumper of Lerma's vehicle was approximately even with the rear bumper of Holland's. The bullet fired by Lerma, from the open drivers side window, struck Holland's vehicle on the right front fender, slightly in front of where Loupe was sitting in the passenger seat.

When Holland realized Lerma had fired at his vehicle, he stopped at the 180 mile marker. Holland stated he got out of the vehicle, checked the bullet hole, and called 911. Holland and Loupe were both uninjured in the incident.

Upon the stop by Colorado State Patrol, a stainless steel Smith and Wesson .357 caliber revolver was recovered from the vehicle. The revolver was found lodged between the drivers seat, where Lerma had been located, and the center console. The cylinder of the revolver was found to contain two fired casings, two live rounds, and two empty chambers. Lerma was discovered to be on [redacted] in New Mexico, as well as being a [redacted] on multiple charges. Lerma was also wanted in New Mexico on a [redacted] and the [redacted] Upon inspection, the revolver was discovered to have an obliterated, unreadable, serial number. Upon investigation into the white Mitsubishi, it was discovered to be bearing fictitious plates. Running the VIN through Vail Police Department Dispatch, the vehicle was discovered to be stolen out of Albuquerque, New Mexico. The theft of the Mitsubishi was discovered to have occurred near a private residence, and the owner was held at gunpoint, kidnapped, bound and gagged, and subsequently escaped capture. At the time of it's theft, the Mitsubishi was bearing NM 15T09 [redacted]. While on scene, Lerma stated to CSP Troopers in reference to Jacobs, "I don't know why you're holding her, I'm the shooter." Lerma was discovered to have a Revoked drivers license status.

Upon her arrival to the Vail Police Department Jail, Jacobs provided the name of "Lucy Lerma". When questioned about her identity, she provided the name of Cheri Anne Jacobs with a year of birth as 1990. Cheri Anne Jacobs was later discovered to be Chelsey Jacobs' sister. Chelsey Jacobs was discovered to be wanted in New Mexico on felony charges. Jacobs was discovered to have a Suspended drivers license status.

Lerma was taken into custody for First Degree Murder, Attempted, First Degree Assault, Attempted, Felony Menacing with a Deadly Weapon, Aggravated Motor Vehicle Theft, Possession of a Defaced Firearm, Possession of a Weapon by a Previous Offender, Illegal Discharge of a Firearm, Driving under Restraint, Revoked, and the New Mexico Warrant.

Jacobs was taken into custody for Aggravated Motor Vehicle Theft, Criminal Impersonation, and the New Mexico [redacted].

I swear the above statement is correct and true to the best of my knowledge and belief.

OFFICER/AFFAIANTS SIGNATURE

(422) CAUSEY, LUKE J

OFFICER'S NAME/CN

PATROL
OFFICER'S DIVISION

STATE OF COLORADO

COUNTY OF EAGLE

The foregoing instrument was acknowledged before me this 31st day of March, 2015 (year) who is personally known

to me or who has produced (ID type) as identification and who (did or did not) taken an oath.

DEPUTY CLERK OF THE COURT, NOTARY PUBLIC, OR ASSISTANT STATE ATTORNEY

TITLE OF RANK/CN

FIRST APPEARANCE/ARREST FORM

(SHOULD ADDITIONAL SPACE BE NEEDED, USE THE PROBABLE CAUSE AFFIDAVIT CONTINUATION.)

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