

District Court, Teller County, Colorado 101 W Bennett Avenue – PO Box 997 Cripple Creek, Colorado 80813	DATE FILED February 26, 2026 4:36 PM FILING ID: 17CB124D40F6B CASE NUMBER: 2026CV30021 <p style="text-align: center;">▲ Court Use Only ▲</p>
Plaintiffs: TOM MCGRAW , a Colorado citizen, STEVE SPODYAK , a Colorado citizen, and KATIE SPODYAK , a Colorado citizen v. Defendant: LUCAS MEYER , a Colorado citizen.	Case No: Division:
Attorneys for Plaintiffs: Todd Collins & Associates, LLC Todd Collins, 49544 Marc B. Tull, 19013 (Of Counsel) 724 E Kiowa Ave, Ste 5 PO Box 456 Elizabeth, CO 80107 Ph: (303) 588-2200 Fax: (800) 787-9516 Email: todd@tcollinsatlaw.com marc@tcollinsatlaw.com	
COMPLAINT WITH JURY DEMAND	

COMES NOW, Plaintiffs, Tom McGraw, Steve Spodyak, and Katie Spodyak by and through their attorneys Todd Collins & Associates, LLC, and hereby state the following in support of their claims.

PARTIES

1. Plaintiff, Tom McGraw, is citizen of Colorado who resides in Park County, Colorado.
2. Plaintiff, Steve Spodyak, is a citizen of Colorado who resides in Park County, Colorado.
3. Plaintiff, Katie Spodyak, is a citizen who resided in Park County, Colorado.
4. Plaintiffs' specific addresses are sealed from public disclosure due to their assignments in law enforcement or their relation to someone whose address is sealed.

5. Defendant, Lucas Meyer, is a resident of Colorado whose last known address is [REDACTED] Florissant, Colorado 80816, located in Teller County, Colorado.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the issue pursuant to Colo. Const. Article VI, § 9 and C.R.S. § 13-1-124(1)(b).

7. Venue is proper in Teller County, Colorado pursuant to C.R.C.P. 98(c) because Plaintiffs are alleging torts and Defendant resides in Teller County, Colorado.

GENERAL ALLEGATIONS

8. Plaintiff, Tom McGraw, is the Sheriff of Park County Colorado.

9. Plaintiff, Steve Spodyak, is the Undersheriff for the Park County Sheriff's Office ("PCSO").

10. Plaintiff, Katie Spodyak, is the wife of Plaintiff Steve Spodyak.

11. Defendant, Lucas Meyer, is employed by Park County as the county manager.

12. There are ongoing disputes between Mr. Meyer and Sheriff McGraw and Undersheriff Spodyak.

13. As the county manager, Mr. Meyer has recently attempted to exercise authority over the PCSO, and Sheriff McGraw and Undersheriff Spodyak have denied Mr. Meyer's attempts.

14. Mr. Meyer has engaged in outrageous conduct in retaliation to Sheriff McGraw's and Undersheriff Spodyak's rebukes of Mr. Meyer's attempts to exercise managerial authority over the PCSO.

15. Mr. Meyer is aware that Undersheriff Spodyak is a candidate for sheriff of Park County, and Spodyak has the support of Sheriff McGraw.

16. Mr. Meyer has gone above and beyond what is morally and legally acceptable in his attempts to assassinate Sheriff McGraw's and Undersheriff Spodyak's reputation and character within and without Park County.

17. On or around November 17, 2025, Mr. Meyer emailed [REDACTED] who is a deputy sheriff employed by the PCSO.

18. Upon information and belief, the November 17, 2025 email that was sent by Mr. Meyer to Deputy [REDACTED] was sent from Mr. Meyer's official Park County email address that he utilizes as the county manager.
19. Mr. Meyer scheduled a meeting with Deputy [REDACTED] at the Java Moose located in Fairplay, Colorado. The meeting occurred on November 17, 2025.
20. At the November 17, 2025 meeting, Mr. Meyer told Deputy [REDACTED] that Plaintiff, Mrs. Spodyak was a victim of physical domestic violence who had been beaten up on multiple occasions.
21. At the November 17, 2025, meeting, Mr. Meyer further told Deputy [REDACTED] that Plaintiff, Mr. Spodyak was the individual who had physically beaten Mrs. Spodyak on multiple occasions.
22. Mr. Meyer further told Deputy [REDACTED] that Mrs. Spodyak had reported the beatings only once, and Mr. Spodyak was arrested.
23. Mr. Meyer further told Deputy [REDACTED] that a former Sergeant [REDACTED] had once arrested Mr. Spodyak for "beating up" Mrs. Spodyak.
24. According to Mr. Meyer, Sergeant [REDACTED] had taken Mr. Spodyak to jail for beating up Mrs. Spodyak.
25. Mr. Meyer further informed Deputy [REDACTED] that, upon learning that Sergeant [REDACTED] had jailed Mr. Spodyak, Sheriff McGraw, as Sheriff, immediately released Mr. Spodyak from jail and fired Sergeant [REDACTED] for arresting and jailing Mr. Spodyak.
26. At the same meeting on November 17, 2025, Mr. Meyer further told Deputy [REDACTED] that Mr. Spodyak was embezzling county funding from the County's short-term rental funds. Specifically, Mr. Meyer told Deputy [REDACTED] that Mr. Spodyak was paying himself an extra \$1,850 each paycheck, and he was illegally paying [REDACTED] a monthly bonus in the same amount.
27. At the same November 17, 2025 meeting with Deputy [REDACTED] Mr. Meyer told [REDACTED] that Sheriff McGraw was corrupt and had been receiving "kickbacks" from the former county manager, [REDACTED] and each individual was party of "corrupt transactions" with the county. Further, Mr. Meyer informed Deputy [REDACTED] that Mr. Spodyak was aware of the "kickbacks" and the "corrupt transactions" but did nothing about them.
28. Mr. Meyer then informed Deputy [REDACTED] that Mr. Spodyak and Sheriff McGraw intended to utilize the PCSO bunkhouse as campaign headquarters.

29. Mr. Meyer then began to tell Deputy [REDACTED] a story about Sheriff McGraw conspiring with Teller County Sheriff [REDACTED] to have a Teller County deputy posted at or near Mr. Meyer's home to harass and intimidate Mr. Meyer.
30. Mr. Meyer went so far as to file a complaint with the Teller County Sheriff's Office ("TCSO") regarding harassment by TCSO.
31. Mr. Meyer told Deputy [REDACTED] that Sheriff McGraw was named in a lawsuit for harassing a former school administrator by posting a deputy outside of her house.
32. On or about December 3, 2025, Mr. Meyer phoned in a false police report to the Fairplay police department identifying Sheriff McGraw as a "disruptive male" at a BOCC meeting.
33. In late December of 2025, Mr. Meyer had a conversation with a county employee who wishes to remain anonymous at this time out of fear of retaliation by Mr. Meyer. Mr. Meyer stated to the employee that Sheriff McGraw had conducted a traffic stop of a Summit County deputy, and Sheriff McGraw, "had an odor of alcohol on his breath" and "put his hands on the deputy" during the traffic stop. Mr. Meyer told this same story to [REDACTED]. Mr. Meyer had further disseminated this story to others including [REDACTED] and other individuals in the Bailey area of Park County.
34. According to this same county employee, Mr. Meyer also told this person that Mr. Spodyak had become so intoxicated while attending the FBI National Academy that the Academy nearly kicked Mr. Spodyak out of the Academy.
35. During the PCSO Christmas party in December 2025, Mrs. Spodyak became very uncomfortable and embarrassed and felt as though people were looking at her as an abused wife and Mr. Spodyak as a spousal abuser. This is an event where Mrs. Spodyak is normally festive and cheerful and feels like she is amongst family, but the feeling at the December 2025 party was one of embarrassment and uncomfortableness and a hesitancy to engage socially with others.
36. Upon information and belief, Mr. Meyer has disseminated the same statements to multiple individuals within and around Park County and the Park County government offices.
37. At all times pertinent hereto, the parties who heard the stories and claims disseminated by Mr. Meyer understood those claims to be referring to the Plaintiffs both individually and at that time collectively.
38. There has been an ongoing dispute between Mr. Meyer, the Spodyak's and Sheriff McGraw.

39. Mr. Meyer scheduled a meeting so he could attempt to “poison the well” so to speak by willfully and maliciously spreading lies to deputies and other officials within and without Park County about Plaintiffs Spodyak and Sheriff McGraw.
40. All of Mr. Meyer’s statements identified herein were false when Mr. Meyer’s told these statements to Deputy [REDACTED] and others identified herein.
41. Mr. Meyer was aware that many of the incidences that he described about Plaintiffs were false at the time he described them. Mr. Meyer, as county manager of Park County, had access to the county’s financial and employment records that prove that some of the falsities he was spreading were in fact false.
42. Mr. Meyer’s intent was to tarnish, destroy, and obliterate Plaintiffs’ reputations while also continuously harassing each of them and causing them as much severe emotional distress as he possibly could.
43. Mr. Meyer’s actions did cause all Plaintiffs to suffer severe emotional distress.
44. There exists no evidence that there is truth to the outrageous statements identified herein as made by Mr. Meyer against and about Plaintiffs.
45. As a result of Defendants dissemination of lies and false statements about Plaintiffs, Plaintiffs have suffered harm to reputation, personal humiliation, mental anguish, or physical suffering.

First Claim for Relief
Defamation Per Se - Slander
Steven Spodyak

46. Plaintiff, Steven Spodyak, incorporates by reference paragraphs 1-45 as though they are fully set forth herein.
47. Plaintiff, Steven Spodyak, is the Undersheriff of Park County, Colorado.
48. As the Undersheriff for Park County, Mr. Spodyak is a peace officer as defined by C.R.S. §§ 16-2.5-101, 103.
49. As Undersheriff, Mr. Spodyak is a general deputy of the PCSO.
50. As a general deputy of the PCSO, Mr. Spodyak was required to “take and subscribe the like oath of office as that required to be taken by [the Sheriff.]” C.R.S. § 30-10-111.

51. The traditional categories of slander per se are imputation of (1) a criminal offense; (2) a loathsome disease; (3) a matter incompatible with the individual's business, trade, profession, or office; or (4) serious sexual misconduct.
52. As described in detail in paragraphs 14-24, and 26-29 above, Mr. Meyer knowingly disseminated false stories about Steven Spodyak.
53. As specifically described herein, Mr. Meyer disseminated false stories about Mr. Spodyak committing the crimes of assault, battery, domestic violence, theft, embezzlement, and political campaign violations.
54. Mr. Meyer also disseminated false stories about Mr. Spodyak being discharged from the FBI national academy for being intoxicated at the academy.
55. The falsehoods disseminated by Mr. Meyer as described in the general allegations herein are incompatible with Mr. Spodyak's profession and office as the Undersheriff of Park County.
56. The falsehoods disseminated by Mr. Meyer about Mr. Spodyak are patently incompatible with Mr. Spodyak's duties and oath as the Undersheriff of Park County.
57. Mr. Meyer published all his statements about Mr. Spodyak as described herein. "Published" applies to all means of communication including words, pictures, and gestures.
58. Mr. Meyer made his statements about Mr. Spodyak for the sole purpose of harming Mr. Spodyak's reputation by lowering Mr. Spodyak in the eyes of the community and amongst Sheriff's peers and colleagues.
59. According to witnesses, they understood Mr. Meyer's statements as described herein and applicable to this claim to be made about Mr. Spodyak.
60. As a result of Mr. Meyer's publishing of slanderous statements about Mr. Spodyak, Mr. Spodyak suffered damages in the form of impairment to his reputation, personal humiliation, mental anguish, physical suffering, and loss of consortium. The amount of damages shall be determined in this proceeding.

Second Claim for Relief
Defamation Per Se - Slander
Tom McGraw

61. Plaintiff, Tom McGraw, incorporates by reference paragraphs 1-60 as though they are fully set forth herein.

62. As the Sheriff for Park County, Mr. McGraw is a peace officer as defined by C.R.S. §§ 16-2.5-101, 103.
63. Sheriff McGraw is the chief law enforcement officer and administrator for the PCSO.
64. Sheriff McGraw is sworn in under oath as Sheriff of Park County, Colorado.
65. The traditional categories of slander per se are imputation of (1) a criminal offense; (2) a loathsome disease; (3) a matter incompatible with the individual's business, trade, profession, or office; or (4) serious sexual misconduct.
66. As described in detail in paragraphs 12-19, 25, and 28-34 above, Mr. Meyer knowingly disseminated false stories about Tom McGraw.
67. As specifically described herein, Mr. Meyer disseminated false stories about Mr. McGraw committing the crimes of theft, embezzlement, harassment, assault, battery, abuse of authority, conspiracy, driving while intoxicated, inchoate crimes in support of his undersheriff, and political campaign violations.
68. The falsehoods disseminated by Mr. Meyer as described in the general allegations herein are incompatible with Mr. McGraw's profession and office as the Sheriff of Park County.
69. The falsehoods disseminated by Mr. Meyer about Mr. McGraw are patently incompatible with Mr. McGraw's duties and oath as the Sheriff of Park County.
70. Specifically, Mr. Meyer disseminated stories that falsely described Sheriff McGraw as Sheriff who abused his authority by protecting his own deputies and staff and firing those who didn't, illegally releasing his Undersheriff from jail, conspired with sheriffs to harass and intimidate citizens including Mr. Meyer, received kickbacks, worked traffic stops while under the influence of alcohol and illegally became physical with an individual whom he stopped on a traffic stop, and conspired with other county managers to illegally obtain county funds.
71. As county manager, Mr. Meyer has access to the entirety of the county's financial records including records of payments to and on behalf of Sheriff McGraw and the PCSO.
72. Upon information and belief, Mr. Meyer reviewed county financial records and then concocted stories he knew to be false after reviewing financial records and then told others identified herein the false stories.
73. Regarding alleged kickbacks and corrupt transactions, Mr. Meyer reviewed county financial records where Sheriff McGraw and former county manager Tom Eisenman had interacted and then developed a false narrative regarding those transactions and disseminated those false stories to others in an attempt to harass, intimidate, and damage and destroy Sheriff

McGraw's reputation within the governmental and law enforcement communities as well as with the public.

74. Regarding Sergeant [REDACTED] dismissal from the PCSO, Mr. Meyer has full access to the county's employment records, and he understood at the time he disseminated that Sheriff McGraw fired Sergeant [REDACTED] for arresting Undersheriff Spodyak that his statement was false because he could see and had seen the actual reason that Sergeant [REDACTED] was dismissed from the PCSO.

75. Mr. Meyer is intimately familiar with the PCSO's bunkhouse and that its construction and use is and was determined by a federal application for grant money to fund its construction. Despite Mr. Meyer's being keenly aware that the PCSO's use of the bunkhouse is restricted to that of a bunkhouse, he disseminated a false story about Sheriff McGraw's and Undersheriff Spodyak's prohibited use of the bunkhouse for a campaign headquarters.

76. At all times pertinent hereto, Mr. Meyer was aware that no Teller County deputy has ever been posted outside or near his home as a result of a conspiracy between Sheriffs McGraw and [REDACTED]. Instead, the false story that Mr. Meyer disseminated was concocted by Mr. Meyer only after he received a citation in Teller County for running a stop sign. Mr. Meyer knew at the time he told the lie about the Sheriffs' conspiracy against him that he had been stopped solely for running a stop sign and there was no larger inter-county conspiracy against him.

77. Mr. Meyer was fully aware of a lawsuit involving a former school administrator. He has reviewed the lawsuit and knows certain facts about it. He knew that the story he told was not true at the time he told the story that he related to that lawsuit about Sheriff McGraw posting a deputy outside that administrator's house to harass her.

78. Mr. Meyer knew his report and identification of Sheriff McGraw were false at the time he reported Sheriff McGraw as a disruptive male at BOCC meetings.

79. At all times pertinent hereto, Mr. Meyer was aware that Sheriff McGraw had conducted a traffic stop of Summit County Sheriff's Office deputy, and Sheriff McGraw let the deputy go with a warning for speeding. Mr. Meyer was further aware that there was detention nor apprehension of the deputy, yet he told the lie about Sheriff McGraw illegally putting hands on the deputy during the stop. Mr. Meyer was further aware that there were no allegations or even suspicion that Sheriff McGraw was consuming or under the influence of alcohol during the traffic stop, yet he told the lie that Sheriff McGraw was under the influence of alcohol and smelled of alcohol during the traffic stop. Mr. Meyer disseminated this story to several of Sheriff McGraw's colleagues and constituents in emergency services and throughout Park County.

80. Mr. Meyer published all his statements about Sheriff McGraw as described herein. "Published" applies to all means of communication including words, pictures, and gestures.

81. Mr. Meyer made his statements about Sheriff McGraw for the sole purpose of harming Sheriff's reputation by lowering the Sheriff in the eyes of the community and amongst Sheriff's peers and colleagues.

82. According to witnesses, they understood Mr. Meyer's statements as described herein and applicable to this claim to be made about Sheriff McGraw.

83. As a result of Mr. Meyer's publishing of slanderous statements about Sheriff McGraw as described herein, Plaintiff McGraw has suffered damages in the form of impairment to his reputation, personal humiliation, mental anguish, and physical suffering. The amount of damages shall be determined in this proceeding.

Third Claim for Relief
Defamation Per Se – Slander
Katie Spodyak

84. Plaintiff, Katie Spodyak, incorporates by reference paragraphs 1-83 as though they are fully set forth herein.

85. Katie Spodyak is the wife of co-plaintiff Steve Spodyak.

86. The traditional categories of slander per se are imputation of (1) a criminal offense; (2) a loathsome disease; (3) a matter incompatible with the individual's business, trade, profession, or office; or (4) serious sexual misconduct.

87. As described in detail in paragraphs 20-25, Mr. Meyer knowingly disseminated false stories about Mrs. Spodyak.

88. As specifically described herein, Mr. Meyer disseminated false stories identifying Mrs. Spodyak as victim of multiple occasions of domestic violence at the hand of her husband, Steve Spodyak.

89. Mrs. Spodyak has never been a victim of domestic violence at the hands of her husband, Steve Spodyak.

90. Mr. Meyer further identified Mrs. Spodyak as a victim of domestic violence, who is complicit about the alleged domestic abuse she was a victim of.

91. Mrs. Spodyak, though never having been a victim of domestic violence, has never been complicit about domestic violence as described herein.

92. Contrary to Mr. Meyer's claims, Mrs. Spodyak has never failed to report any domestic violence against her, because there simply has never been any to report.
93. Mr. Meyer has identified Mrs. Spodyak as someone who suffers from Battered Woman Syndrome.
94. Mr. Meyer published all his statements about Mrs. Spodyak as described herein. "Published" applies to all means of communication including words, pictures, and gestures.
95. Mr. Meyer made his statements about Mrs. Spodyak for the sole purpose of harming her and her husband's reputation by lowering them in the eyes of the community and amongst their peers and colleagues.
96. According to witnesses, they understood Mr. Meyer's statements as described herein and applicable to this claim to be made about Mrs. Spodyak.
97. As a result of Mr. Meyer's publishing of slanderous statements about Mrs. Spodyak, Mrs. Spodyak has suffered damages in the form of impairment to her reputation, personal humiliation, mental anguish, physical suffering, and loss of consortium. The amount of damages shall be determined in this proceeding.

Fourth Claim for Relief
Extreme and Outrageous Conduct
Intentional Infliction of Emotional Distress
All Plaintiffs

98. Plaintiffs incorporate by reference paragraphs 1-97 as though they are fully set forth herein.
99. Mr. Meyer engaged in extreme and outrageous conduct. His conduct was calculated to cause Plaintiffs severe emotional distress. Mr. Meyer falsely alleged that Plaintiffs were engaged in crimes as described throughout this Complaint, ongoing multiple conspiracies with other law enforcement agencies and former elected officials, and perpetrate violent crimes against spouses, covered up crimes, and wrongfully identified Mrs. Spodyak as a victim who suffered from battered woman's syndrome who did not report the repeated physical abuses of her husband.
100. Mr. Meyer engaged in such outrageous behavior for revenge and retribution against Plaintiffs solely because he was upset and felt inferior because Mr. McGraw and Mr. Spodyak refused to acknowledge that Mr. Meyer possessed any authority as county manager over either Mr. McGraw or Mr. Spodyak.

101. Mr. Meyer engaged in simply atrocious behavior by recklessly and needlessly making Mrs. Spodyak a subject of his personal attacks stemming from his emotional outburst resulting from Mr. McGraw's and Mr. Spodyak's denial of Mr. Meyer's attempt to exercise authority over the PCSO.

102. Mr. Meyer branded Plaintiffs as criminals and individuals who supported rather than prevented criminal behavior. Mr. Meyer encouraged the dissemination of these false claims by spreading the false claims identified herein to Plaintiffs' colleagues, coworkers, and fellow elected officials such as fire chiefs, deputies, and parties running for elected office in Park County. Mr. Meyer filed false reports about Mr. McGraw and Mr. Spodyak with other law enforcement agencies such as the Fairplay Police Department and the Colorado Bureau of Investigation.

103. Mr. Meyer's actions have caused all Plaintiffs to suffer severe emotional distress both at work and in public settings. Plaintiffs have been questioned by their colleagues and friends about Mr. Meyer's false accusations, making them feel uncomfortable and feel the need to explain themselves. Mrs. Spodyak is not comfortable with attending public functions because of Mr. Meyer's false claims and feels as though people view her as a victim and view her husband as batterer and criminal.

104. Mr. McGraw and Mr. Spodyak live in constant fear that someone may actually believe the false criminal accusations that Mr. Meyer is spreading about them. All aspects of their lives have been affected. They are unsure of their risk of retaliation by the community and voters whether at home or going to and from work. They worry that their presence could endanger or cause concern for those close to them through guilt by association.

105. All Plaintiffs have altered all aspects of their lives in response to Defendant's conduct, including things as basic as where and how to go out in public, and when to see family and friends.

106. The results of Defendant's ongoing conduct are foreseeable and obscene. This conduct is so outrageous in character and extreme in degree as to go beyond all possible bounds of decency. It should be regarded as atrocious and determined intolerable in a civilized community.

107. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered significant actual and special damages including, without limitation, emotional distress, overwhelming stress and anxiety, and loss of consortium.

PRAYER FOR RELIEF

For these reasons, Plaintiff respectfully requests that the Court enter judgment against Defendants, including, but not limited to:

1. Damages for defamatory publications made by Defendant about each Plaintiff in amounts to be determined at trial; and
2. Damages for Defendant's intentional infliction of emotional distress upon each Plaintiff; and
3. Leave to amend this Complaint and allege exemplary damages in an amount to be proven at trial after the exchange of initial disclosures pursuant to Colorado Rules of Civil Procedure and Plaintiff establishes prima facie proof of triable issues pursuant to C.R.S. § 13-21-102; and
4. Attorney's fees and costs; and
5. Prejudgment and post-judgment interest; and
6. Such other and further relief, both general and special, to which Plaintiffs may be justly entitled to receive

Jury Demand

Plaintiffs demand a trial by jury and paid the requisite fee.

Respectfully submitted February 26, 2026.

Original on file at: **Todd Collins & Associates, LLC**

s/ Todd Collins

Todd Collins, 49544

Todd Collins & Associates, LLC

Attorney for Plaintiffs

Address of Plaintiffs:

Sealed by Statute