

District Court, El Paso County, Colorado 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: June 27, 2022 4:21 PM FILING ID: 9A0DC42855648 CASE NUMBER: 2022CR3106
<b>THE PEOPLE OF THE STATE OF          COLORADO</b> vs. <b>AMBER LYNN GREEN ,</b> Defendant	<input type="checkbox"/> <b>COURT USE ONLY</b> <input type="checkbox"/>
Michael J Allen Fourth Judicial District District Attorney, # 42955 El Paso County District Attorneys Office 105 E. Vermijo Avenue Colorado Springs, CO 80903 Phone Number: 719-520-6000 Fax: 719-520-6172	Case No: D0212022CR003106  Div: 18                      Courtroom:
<b>COMPLAINT AND INFORMATION</b>	

**CHARGES: 3**

**COUNT 1: FIRST DEGREE BURGLARY, C.R.S. 18-4-202(1) (F3){06011}**

**COUNT 2: MENACING, C.R.S. 18-3-206(1)(a)/(b) (F5){02053}**

**COUNT 3: CHILD ABUSE, C.R.S. 18-6-401(1),(7)(b)(I) (M2){1701X}**

Michael J Allen, District Attorney for the Fourth Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of El Paso:

**COUNT 1-FIRST DEGREE BURGLARY (F3)**

Between and including December 28, 2021 and June 21, 2022, Amber Lynn Green unlawfully, feloniously, and knowingly entered or remained unlawfully after a lawful or unlawful entry in a building or occupied structure of **Randy Shaffner** and/or **Cheryl Shaffner** located at **2885 Mt. Hermon Road, Monument, CO** with the intent to commit therein the crime of menacing, and while effecting entry or while inside or while in immediate flight therefrom, the defendant assaulted or menaced **Randy Shaffner** in violation of section 18-4-202(1), C.R.S.

**COUNT 2-MENACING (F5)**

Between and including December 28, 2021 and June 21, 2022, Amber Lynn Green, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place **Randy Shaffner** in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: handgun; in violation of section 18-3-206(1)(a)/(b), C.R.S.

**COUNT 3-CHILD ABUSE (M2)**

Between and including December 28, 2021 and June 21, 2022, Amber Lynn Green unlawfully, knowingly, or recklessly, permitted **Colton Green** a child, to be unreasonably placed in a situation which posed a threat of injury to the life or health of the child; in violation of section 18-6-401(1),(7)(b)(I), C.R.S.

All offenses against the peace and dignity of the people of the State of Colorado.

Michael J Allen  
District Attorney, #: 42955

By: /s/ Laurel Chase Date: 6/27/2022  
Laurel Chase #: 48287  
Deputy District Attorney

**ENDORSED WITNESS LIST**

Westen Rubio  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

SCOTT WILLIAM Robblee  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

Aaron Aguayo  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

Deborah Mynatt  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

Matthew Ernest Green  
16556 Hallmark Trl  
Monument, CO 80132

~~Gandy Gale Sheffer~~  
~~885 Mt Herman Rd~~  
~~Monument, CO 80132~~

~~Cheryl Dawn Sheffer~~  
~~885 Mt Herman Rd~~  
~~Monument, CO 80132~~

~~Colton Green~~  
~~Of Colton Green~~  
~~16556 Hallmark Trl~~  
~~Monument, CO 80132~~

MARCUS ANTHONY Miller  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

Jonathan Pennington  
El Paso Co Sheriffs Office  
27 East Vermijo Avenue  
Colorado Springs, CO 80903

**DEFENDANT INFORMATION**

DOB: 3/2/1984

Race: O

Gender: F

Height:

Weight: 140

Hair: BRO

Eye: HAZ

Birthplace:

Tattoo:

Address:

Home Phone #: -

Work Phone #: -

AKA:

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**CASE INFORMATION**

Arresting Agency:

Arresting ORI:

Other Number:

Offense Agency: El Paso Co Sheriffs Office

Offense ORI: CO0210000

Arrest #:

Agency Case #: 22-7304

Date of Arrest:

BAC: \_\_\_\_\_

CCIC#: \_\_\_\_\_

NCIC #:

SID#: XK218893