



DATE: April 1, 2026

TO: Colorado Springs City Council

FROM: Office of the City Attorney

SUBJECT: *Christopher D. Grant v. Larry Downard, Richard S. Hallman, Jeremy Wood, Celina M McAlpine Case No. 2026CV87*

This memorandum is to apprise you of the facts alleged in the above-referenced case as you consider the claims made against the officers involved.

NATURE OF THE CASE

Plaintiff, Christopher Grant, brought this case pro se in the El Paso County District Court, alleging that Officers Downard, Hallman, and Wood, along with Ms. McAlpine, who is a City employee but not a police officer, violated his rights pursuant to the United States Constitution. Specifically, Plaintiff claims that Officer Downard used excessive force by deploying his taser as Plaintiff was walking away.

According to Plaintiff's complaint, on August 26, 2025, at 3:00 am, he was walking down Monument Street when Officer Downard approached him, repeatedly told him to stop, and that he was being detained. Plaintiff claims that he was tased when he began trying to record the incident on his cell phone. Plaintiff's complaint also shows that he was initially charged with violating his parole because of this incident. He claims that he was held in jail for over 140 days before he accepted a plea deal related to a traffic offense. The complaint does not contain any specific allegations concerning Defendants Hallman, Wood, or McAlpine.

According to reports and body worn camera footage, on August 26, 2025, at or about 3:00 am, Officer Downard was on patrol at or near the intersection of Tia Juana Street and Dale Street. Officer Downard observed a vehicle approach the intersection and stop at the stop sign. After a noticeable delay, the vehicle began moving, and Officer Downard observed that it was missing its front license plate. Officer Downard also observed Plaintiff driving the vehicle. As Officer Downard turned his patrol vehicle around to contact Plaintiff, Plaintiff made a series of turns, parked the vehicle, got out, quickly started walking away, and threw something from his person. Officer Downard

approached Plaintiff and instructed him to stop. However, Plaintiff refused. When Officer Downard warned Plaintiff that he would be tased if he did not stop, Plaintiff began to run. Officer Downard deployed his taser twice. However, the taser was ineffective and Plaintiff continued to flee. Officer Downard chased Plaintiff until other officers arrived and assisted in his apprehension. Defendant's Wood and Hallman arrived after Plaintiff was placed in handcuffs and detained.

RECOMMENDATION

The Civil Action Investigation Committee met on April 1, 2026, and recommends City Council acknowledge the City's obligation to represent the officers and employee involved, as required by the Colorado Governmental Immunity Act and the Peace Officer's Liability Act. The officers and employee were acting in the course and scope of their employment and in good faith. As usual, it is recommended that the City reserve the right to decline payment of any award of punitive damages.