

<p>DISTRICT COURT OF THE 1ST JUDICIAL DISTRICT, JEFFERSON COUNTY DISTRICT COURT STATE OF COLORADO</p> <p>Court Address: 100 Jefferson County Parkway Golden, Colorado 80401</p> <p>Phone Number: (720)772-2500</p>	<p>DATE FILED December 29, 2025 1:41 PM FILING ID: 669F5FF6EB113 CASE NUMBER: 2025CV32147</p>
<p>Plaintiff:</p> <p>JACK HOWARD</p> <p>v.</p> <p>Defendants:</p> <p>BRENT METZ</p>	<p>▲ Court Use Only ▲</p>
<p>Plaintiff's Attorney:</p> <p>Britt A. Holtz, Esq. #49051 ZANER LAW, LLC 1610 Wynkoop Street, Suite 120 Denver, CO 80202 Phone: 303.563.5354 Facsimile: 303.563.5351 Email: bh@zanerlaw.com</p>	<p>Case No.:</p> <p>Division:</p>
<p align="center">CIVIL COMPLAINT AND JURY DEMAND</p>	

Plaintiff, Jack Howard, by and through his undersigned attorneys, ZANER LAW, LLC, hereby submits his Civil Complaint and Jury Demand, and asserts as follows:

JURISDICTION AND VENUE

1. At all times relevant to this action, Plaintiff Jack Howard (hereinafter "Plaintiff") was a resident of Jefferson County, Colorado.
2. Upon information and belief, at all times relevant to this action, Defendant Brent Metz (hereinafter "Defendant") was a resident of Jefferson County, Colorado.
3. This action arises out of a shooting incident that occurred on September 10, 2024, at or near 23391 Pleasant Park Road, Conifer, Colorado 80433.
4. Venue is proper in Jefferson County District Court pursuant to C.R.C.P. 98(c).

FACTUAL ALLEGATIONS

5. Plaintiff incorporates by this reference the allegations set forth with specificity in paragraphs 1 through 4 of this Civil Complaint, as if set forth *verbatim*.

6. Plaintiff and Defendant were involved in a shooting incident that occurred on September 10, 2024, outside of the property fence line located at 23391 Pleasant Park Road, Conifer, Colorado 80433 (the Property).

7. Upon information and belief, Hartwood Ranch, LLC, is the owner of the Property.

8. Upon information and belief, Defendant is a managing member Hartwood Ranch, LLC.

9. On the aforementioned date, Plaintiff, who was 17 years old at the time, and a 15-year-old friend, were driving in the Conifer, Colorado area, searching for a potential venue to take their upcoming high school homecoming photos.

10. While driving, Plaintiff and his friend located the Property and decided to stop to attempt to make contact with the owner of the Property to ask if the boys could take homecoming photographs at the Property.

11. Upon information and belief, Plaintiff pulled his vehicle to the side of the roadway, near the short driveway area before the gate and main driveway area depicted in the photograph below.



12. After parking the vehicle, in attempting to make contact with the Property owner, Plaintiff and his friend jumped the gate area depicted above and walked up the driveway area to the main residence area of the Property to knock on the door.

13. Upon information and belief, when Plaintiff and his friend approached the main residence area of the property, security cameras on the Property were triggered, notifying Defendant's girlfriend of the presence of Plaintiff and his friend on the Property.

14. After knocking on the door at the Property and unsuccessfully making contact with the owner, Plaintiff and his friend walked to other buildings on the Property in an effort to make contact with someone at the Property to ask permission to take homecoming photos on the Property.

15. After unsuccessfully making contact with anyone on the Property, Plaintiff and his friend walked back down the driveway and returned over the wooden fence, returning to Plaintiff's vehicle.

16. Upon information and belief, after the security cameras on the Property were triggered, Defendant's girlfriend contacted law enforcement to report the boys' presence on the Property, who began to respond to the Property.

17. Upon information and belief, after contacting law enforcement, Defendant's girlfriend then contacted Defendant and notified him of the boys' presence on the Property.

18. Upon information and belief, Defendant was notified that law enforcement had been contacted and was responding to the Property.

19. Upon information and belief, rather than waiting for law enforcement to arrive at the Property, Defendant drove to the property himself to attempt to intervene.

20. After returning to Plaintiff's vehicle, Plaintiff and his friend began to write a note addressed to the owner of the Property, asking for permission to use the Property to take their homecoming photographs.

21. Upon information and belief, as Plaintiff was sitting in the driver's seat of his vehicle writing the aforementioned note, Defendant arrived at the Property in his vehicle and pulled his vehicle in front of Plaintiff's car in such a manner as to prevent Plaintiff's car from exiting onto the roadway.

22. Upon information and belief, after blocking Plaintiff's vehicle in, Defendant exited the cab of his truck, unholstered a handgun, and pointed it through the front windshield of Plaintiff's vehicle at Plaintiff.

23. Upon information and belief, before any communication was had between Plaintiff and Defendant, Defendant negligently and unintentionally discharged the handgun, causing a bullet to travel through the front windshield of Plaintiff's vehicle.

24. Upon information and belief, after traveling through the windshield, the bullet fragmented struck Plaintiff in the nose, traveling through his nasal passage, with other fragments striking Plaintiff's eye, lip, tooth, and arm.

25. As a result of the shooting, Plaintiff sustained significant injuries, including, but not limited to, open fractures of the left maxillary and orbital floor, a chipped tooth, and a vascular injury to his left eye.

26. As a result of the incident, Plaintiff underwent significant medical treatment, including but not limited to, emergency surgical procedures, doctor's visits, and mental health treatment, among other treatment.

27. As a result of his incident related injuries, Plaintiff has incurred in excess of \$100,000.00 in medical care.

28. Plaintiff was not comparatively negligent.

29. At the time of the incident, Plaintiff was not on the Property and was not posing any threat to Defendant.

30. At the time of the incident, Plaintiff was in a lawful location in his vehicle on the roadway.

31. When Defendant blocked Plaintiff's vehicle, exited his vehicle, pointed a loaded gun at Plaintiff, and negligently discharged the firearm, he acted in a careless and imprudent manner and failed to take into account the safety of others, particularly that of Plaintiff.

32. As a direct and proximate result of Defendant's negligence, Plaintiff incurred past and future economic injuries, losses, and damages, including, but not limited to, past and future medical expenses, rehabilitation expenses, wage loss, loss of earning capacity, and other economic losses.

33. As a direct and proximate result of Defendant's negligence, Plaintiff has suffered in the past, and will continue to suffer in the future, non-economic damages including, but not limited to, pain and suffering, loss of enjoyment of life, inconvenience, emotional distress, and impairment of quality of life.

34. As a direct and proximate result of Defendant's negligence, Plaintiff has suffered and will continue to suffer in the future, impairment and disfigurement.

FIRST CLAIM FOR RELIEF
Negligence

35. Plaintiff incorporates herein by this reference the allegations set forth with specificity in paragraphs 1 through 34 of this Complaint, as if set forth *verbatim*.

36. Defendant owed Plaintiff a duty to use reasonable care in his handling and operation of the loaded handgun.

37. When Defendant pointed the loaded gun at Plaintiff and caused the handgun to discharge, he breached the above-referenced duty.

38. The above breach of duty is the direct and proximate cause of the injuries, sustained by Plaintiff.

39. As a direct and proximate result of Defendant's breach of the aforementioned duty, Plaintiff sustained injuries, damages, and losses, as described above.

SECOND CLAIM FOR RELIEF
Negligence Per Se

40. Plaintiff incorporates by this reference the allegations set forth with specificity in paragraphs 1 through 40 of this Complaint, as if set forth *verbatim*.

41. When Defendant carelessly and/or recklessly pointed the gun at Plaintiff and caused the aforementioned incident, he was in violation of applicable municipal ordinances and Colorado statutes including, but not limited to C.R.S. § 18-12-107.5.

42. Plaintiff is a member of the class for whose protection the above-referenced statute was enacted.

43. The incident described above and the injuries, damages, and losses that Plaintiff suffered as a result of the incident are the kind of injuries, damages, and losses sought to be prevented by the passage of the above-referenced statute.

44. Defendant's violation of the above-referenced statute constitutes negligence *per se*.

45. As a direct and proximate result of Defendant's violation of the above-referenced statute, Plaintiff has sustained injuries, damages, and losses.

JURY DEMAND

Trial to a jury of six (6) is requested on all issues so triable.

WHEREFORE, the Plaintiff, Jack Howard, prays for judgment against Defendant, Brent Metz, in an amount to be determined by the trier of fact for his losses as set forth above and for costs, expert witness fees, filing fees, pre and post-judgment interest, and for such other and further relief as the Court may deem just and proper.

Dated this 29th day of December, 2025.

Respectfully submitted,

ZANER LAW, LLC

/s/ Britt A. Holtz
Britt A. Holtz
Attorney for Plaintiff

Plaintiff's Address:

7590 West Coal Mine Avenue, Apt. G
Littleton, CO 80123