

District Court, City and County of Denver, Colorado City and County Building, Room 424 1437 Bannock Street Denver, CO 80202	DATE FILED: June 26, 2019 4:24 PM FILING ID: A2BDBE831CF58 CASE NUMBER: 2019CR15211
Plaintiff: THE PEOPLE OF THE STATE OF COLORADO	
Defendants:	COURT USE ONLY
MAREN RAQUEL GASSER JONATHAN WRAY HOVEY MATTHEW WADE TURKETT BRETT ALAN CRAVENS KASEE RAE DELA-TORRE JOHN CHRISTOPHER GARCIA CORY ROGER HALVORSON JOSEPH JAMES KING SARAH MARIE LORE	
INDICTMENT	

VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3), (F2) <37284> 1 (1 count)

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G> 2, 5, 9, 13, 16, 23, 26 (7 counts)

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C> 3, 6, 10, 14, 17, 24, 27 (7 counts)

THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12> 4, 11, 25, 29 (4 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4) <0804H> 7, 19, 101, 109, 118, 119 (6 counts)

SECOND DEGREE FORGERY, 18-5-104;42-7-301.5(1) C.R.S. (M1) <10032> 8 (1 count)

SECOND DEGREE BURGLARY, 18-4-203(1),(2)(a) C.R.S. (F3) <06032> 12, 18 (2 counts)

THEFT, 18-4-401(1),(2)(d) C.R.S. (M2) <08A11> 15, 121 (2 counts)

FIRST DEGREE CRIMINAL TRESPASS, 18-4-502 C.R.S. (F5) <09023> 20 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G> 21, 22, 102, 112, 123, 125 (6 counts)

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13> 28 (1 count)

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H> 30-99, 113, 117 (72 counts)

POSSESSION OF IDENTITY THEFT TOOLS, 18-5-905 C.R.S. (F5) <1308S> 100 (1 count)

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <4110S> 103-108 (6 counts)

THEFT, 18-4-401(1),(2)(c) C.R.S. (M3) <0801Z> 110, 111, 116 (3 counts)

POSSESSION OF A CONTROLLED SUBSTANCE, 18-18-403.5(1),(2)(a) C.R.S. (DF4) <8101B > 114 (1 count)

VEHICULAR ELUDING, 18-9-116.5 C.R.S. (F5) <2716Z> 115 (1 count)

CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, 18-3-102(1)(a);18-2-101 C.R.S. (F2) <01011A> 120, 124 (2 counts)

SECOND DEGREE BURGLARY, 18-4-203(1) C.R.S. (F4) <06031> 122 (1 count)

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, 18-12-108(1) C.R.S. (F6) <3007A> 126 (1 count)

The Grand Jury presents the within Indictment and the same is ordered filed.

Dated this 26 day of June, 2019.



**Martin F. Egelhoff
Presiding Judge
Denver District Court**

INDICTMENT

STATE OF COLORADO)
)
COUNTY OF DENVER)

Of the term of the District Court in the year 2019, the Grand Jurors chosen, selected and sworn in and for the County of Denver, in the name and by the authority of the People of the State of Colorado, upon their oaths, present their indictment of: **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY, MATTHEW WADE TURKETT, BRETT ALAN CRAVENS, KASEE RAE DELA-TORRE, JOHN CHRISTOPHER GARCIA, CORY ROGER HALVORSON, JOSEPH JAMES KING, and SARAH MARIE LORE**, for the following described acts, committed, or triable, in the County of Denver, all done contrary to the form of the statutes in such case made and provided, and against the peace and dignity of the People of the State of Colorado, as stated in the counts attached hereto.

Dated this 2nd day of June, 2019.

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE:
(0000)

TRUE BILL_____

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWO:
(Identity theft)

TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT THREE:
(forgery)

TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT FOUR:
(theft)

TRUE BILL,

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT FIVE:
(identity theft)

TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT SIX:
(forgery)

TRUE BILL, ---

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT SEVEN:
(1st degree agg motor vehicle theft)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT EIGHT:
(forgery)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT NINE:
(identity theft)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TEN:
(forgery)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ELEVEN:
(theft)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWELVE:
(2nd degree burglary)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT THIRTEEN:
(identity theft)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT FOURTEEN:
(forgery)

TRUE BILL C

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT FIFTEEN:

(theft)

TRUE BILL_

NO TRUE BILL.

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT SIXTEEN:

(identity theft)

TRUE BILL_

NO TRUE BILL_

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT SEVENTEEN:

(forgery)

TRUE BILL

NO TRUE BILL_

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT EIGHTEEN:

(2nd degree burglary)

TRUE BILL_

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT NINETEEN:

(1st degree agg motor vehicle theft)

TRUE BILL_

NO TRUE BILL_

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWENTY:

(criminal trespass)

TRUE BILL_

NO TRUE BILL.

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWENTY-ONE:

(1st degree agg motor vehicle theft)

TRUE BILL_

NO TRUE BILL.

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWENTY-TWO:

(1st degree agg motor vehicle theft)

TRUE BILL_

NO TRUE BILL..

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT TWENTY-THREE:

(identity theft)

TRUE BILL_

NO TRUE BILL_

AS TO COUNT TWENTY-FOUR:
(forgery)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT TWENTY-FIVE:
(theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT TWENTY-SIX:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT TWENTY-SEVEN:
(forgery)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT TWENTY-EIGHT:
(theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT TWENTY-NINE:
(theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-ONE:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-TWO:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-THREE:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-FOUR:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-FIVE:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-SIX:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-SEVEN:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-EIGHT:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT THIRTY-NINE:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT FORTY:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT FORTY-ONE:
(identity theft)

TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT FORTY-TWO:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL _____
NO TRUE BILL _____

AS TO COUNT FORTY-THREE:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓
NO TRUE BILL _____

AS TO COUNT FORTY-FOUR:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓

AS TO COUNT FORTY-FIVE:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓
NO TRUE BILL _____

AS TO COUNT FORTY-SIX:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL _____
NO TRUE BILL _____

AS TO COUNT FORTY-SEVEN:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL _____
NO TRUE BILL _____

AS TO COUNT FORTY-EIGHT:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓
NO TRUE BILL _____

AS TO COUNT FORTY-NINE:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓
NO TRUE BILL _____

AS TO COUNT FIFTY:
(identity theft)

REDACTED PURSUANT TO COURT ORDER
TRUE BILL ✓
NO TRUE BILL _____

AS TO COUNT FIFTY-ONE: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-TWO: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-THREE: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-FOUR: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-FIVE: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-SIX: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-SEVEN: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-EIGHT: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____
AS TO COUNT FIFTY-NINE: (identity theft)	REDACTED PURSUANT TO COURT ORDER TRUE BILL _____ NO TRUE BILL _____

REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

TRUE BILL

NO TRUE BILL
TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL
 TRUE BILL

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL
REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL
REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

TRUE BILL

NO TRUE BILL _____
 TRUE BILL (**REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

TRUE BILL

TRUE BILL, REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL

TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

TRUE BILL,  REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

TRUE BILL **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL

AS TO COUNT SEVENTY-EIGHT:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT SEVENTY-NINE:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-ONE:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-TWO:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-THREE:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-FOUR:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-FIVE:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-SIX:
(identity theft)

TRUE BILL REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-SEVEN:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-EIGHT:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT EIGHTY-NINE:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY-ONE:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY-TWO:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY-THREE:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY-FOUR:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

AS TO COUNT NINETY-FIVE:
(identity theft)

TRUE BILL ✓

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL _____

TRUE BILL

NO TRUE BILL _____
TRUE BILL  **REDACTED PURSUANT TO COURT ORDER**

NO TRUE BILL
REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

TRUE BILL

NO TRUE BILL _____
TRUE BILL 4 REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL
 REDACTED PURSUANT TO COURT ORDER
 TRUE BILL

NO TRUE BILL
REDACTED PURSUANT TO COURT ORDER
TRUE BILL

NO TRUE BILL _____
TRUE BILL ✓ REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL **REDACTED PURSUANT TO COURT ORDER**
TRUE BILL

		REDACTED PURSUANT TO COURT ORDER
AS TO COUNT ONE HUNDRED FIVE: (pawnbroker act violation)	TRUE BILL <u> </u>	
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED SIX: (pawnbroker act violation)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED SEVEN: (pawnbroker act violation)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED EIGHT: (pawnbroker act violation)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED NINE: (1 st degree agg motor vehicle theft)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED TEN: (theft)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED ELEVEN: (theft)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED TWELVE: (1 st degree agg motor vehicle theft)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	
AS TO COUNT ONE HUNDRED THIRTEEN: (identity theft)	TRUE BILL <u> </u>	REDACTED PURSUANT TO COURT ORDER
	NO TRUE BILL <u> </u>	

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE HUNDRED FOURTEEN: TRUE BILL____
(possession controlled substance)

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE HUNDRED FIFTEEN: TRUE BILL____
(vehicular eluding)

NO TRUE BILL_____

AS TO COUNT ONE HUNDRED SIXTEEN: TRUE BILL____
(theft)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL_____

AS TO COUNT ONE HUNDRED SEVENTEEN: TRUE BILL____
(identity theft)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT ONE HUNDRED EIGHTEEN: TRUE BILL____
(1st degree agg motor vehicle theft)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL_____

AS TO COUNT ONE HUNDRED NINETEEN: TRUE BILL____
(1st degree agg motor vehicle theft)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY: TRUE BILL____
(criminal attempt to commit murder in the 1st degree)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-ONE: TRUE BILL____
(theft)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL_____

AS TO COUNT ONE HUNDRED TWENTY-TWO: TRUE BILL____
(2nd degree burglary)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL_____

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE HUNDRED TWENTY-THREE: TRUE BILL_
(1st degree agg motor vehicle theft)

NO TRUE BILL_

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE HUNDRED TWENTY-FOUR: TRUE BILL_
(criminal attempt to commit murder in the 1st degree)

NO TRUE BILL_

REDACTED PURSUANT TO COURT ORDER

AS TO COUNT ONE HUNDRED TWENTY-FIVE: TRUE BILL_
(1st degree agg motor vehicle theft)

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-SIX: TRUE BILL_
(pwp/po)

REDACTED PURSUANT TO COURT ORDER

NO TRUE BILL

REDACTED PURSUANT TO COURT ORDER

I, _____, the Foreperson of the 2019 Denver County Statutory Grand Jury, Panel B, do hereby swear and affirm that each and every True Bill returned in this Indictment by the 2019 Denver County Statutory Grand Jury, Panel B, was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the 2019 Denver County Statutory Grand Jury, Panel B. The 2019 Denver County Statutory Grand Jury, Panel B, authorizes and instructs the Denver District Attorney to return this Indictment to open court with or without the presence of the Foreperson.

REDACTED PURSUANT TO COURT ORDER

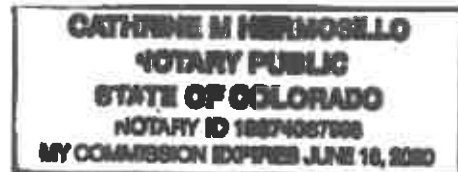
Foreperson

Subscribed and sworn to before me in the County of Denver, State of Colorado, this
26th day of June, 2019.

Catherine M. Hermosillo
Notary Public

My commission expires:

6/26/19



BETH McCANN
District Attorney

By: 

ROBERT S. NITIDO, Reg. No. 43560
Denver District Attorney's Office
201 W. Colfax Ave., Dept. 801
Denver, CO 80202
720-913-9015

COUNT ONE

VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3), (F2) <37284>

Between and including May 27, 2018 and June 26, 2019, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY, and MATTHEW WADE TURKETT, while employed by or associated with an enterprise, namely: a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

The Enterprise

The enterprise alleged in this count was a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY, MATTHEW WADE TURKETT, BRETT ALAN CRAVENS, KASEE RAE DELA-TORRE, JOHN CHRISTOPHER GARCIA, CORY ROGER HALVORSON, JOSEPH JAMES KING, SARAH MARIE LORE, CHRISTOPHER BAHL, MISTY CHAVEZ, COURTNEY RENEE HERBERT, STEVEN HERNANDEZ, LARISSA KOCHIS, MATTHEW MCCALLOP, KAYLA PAGANO, and other persons to the Grand Jury unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

Pattern of Racketeering Activity

For purposes of this count, the defendants engaged in acts related to the conduct of the enterprise, including:

As to MAREN RAQUEL GASSER, the acts described in counts 29 through 101, including any lesser included offenses of these counts.

As to JONATHAN WRAY HOVEY, the acts described in counts 9, 10, 11, 16, 17, and 22 through 100, including any lesser included offenses of these counts.

As to MATTHEW WADE TURKETT, the acts described in counts 7, 8, 18, 19, 22, 26 through 102, 109, 116, 117, 118, and 121 through 125, including any lesser included offenses of these counts.

The facts supporting Count 1 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. From at least May 27, 2018 through June 26, 2019, with various members joining at various times, Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, and a group of individuals associated in fact, though not a legal entity, including, but not limited to, Brett Alan Cravens, Kasee Rae Dela-Torre, John Christopher Garcia, Cory Roger Halvorson, Joseph James King, Sarah Marie Lore, and other persons known or unknown, including, but not limited to, Christopher Bahl, Misty Chavez, Courtney Renee Herbert, Steven Hernandez, Larissa Kochis, Matthew McCallop and Kayla Pagano, were a group of individuals associated in fact, though not a legal entity, with common goals. The common goals of the enterprise were to unlawfully obtain, share, distribute and use controlled substances, stolen money, stolen weapons, stolen motor vehicles, stolen bicycles, stolen identification documents, stolen financial transaction devices, stolen merchandise, stolen electronic devices, and other stolen property. Members of the enterprise obtained stolen property in Colorado primarily through stealing mail from the United States Postal Service delivery system, stealing motor vehicles, trespassing motor vehicles, burglarizing garages, and committing identity theft. Enterprise members sold and / or traded stolen property through a variety of methods including, but not limited to, face-to-face meetings.**
- 3. Enterprise members including, but not limited to, Maren Raquel Gasser, Jonathan Wray Hovey, Matthew Wade Turkett, Brett Alan Cravens, Cory Roger Halvorson, and Sarah Marie Lore, working in concert with each other and/or with persons known and unknown to the Grand Jury, stole at least twelve motor vehicles in the Denver metropolitan area, including vehicles stolen from locations in the City and County of Denver, State of Colorado.**
- 4. Enterprise members including, but not limited to, Matthew Wade Turkett and John Christopher Garcia, working in concert with each other and/or with persons known and unknown to the Grand Jury, burglarized at least two attached garages and one hotel in the Denver metropolitan area to steal motor vehicles, identification documents, financial transaction devices, keys, and other property.**
- 5. Enterprise members including, but not limited to, Maren Raquel Gasser, Jonathan Wray Hovey, Matthew Wade Turkett, and John Christopher Garcia, quickly used stolen identification documents and financial transaction devices to make unauthorized purchases of gift cards, clothes, electronic devices, food, and other items.**
- 6. Enterprise members including, but not limited to, Maren Raquel Gasser, Jonathan Wray Hovey, Matthew Wade Turkett, Brett Alan Cravens and Sarah Marie Lore, stole personal and financial identifying information from the United States Postal Service mail delivery system, including mail stolen from locations in the City and County of Denver, State of Colorado. During all times relevant to this Indictment enterprise members stole mail containing the personal and / or financial identifying information of more than one hundred and seventy (170) victims.**

7. Enterprise members including, but not limited to, Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, exploited stolen personal identifying information and stolen financial information by generating "profiles" and opening credit accounts in the names of the victims, then using those fraudulent accounts to purchase gift cards and merchandise.

8. Enterprise members including, but not limited to, Jonathan Wray Hovey, Matthew Wade Turkett, Kasee Rae Dela-Torre and Joseph James King, exploited stolen personal identifying information and stolen financial information by creating counterfeit checks and / or forging authentic stolen checks, then uttering those checks in exchange for money and merchandise.

9. Enterprise members including, but not limited to, Jonathan Wray Hovey and Matthew Wade Turkett, exploited stolen personal identifying information by creating counterfeit identification documents, then using those documents in concert with the fraudulent credit accounts and counterfeit checks.

10. During all times relevant to this Indictment, one or more enterprise members stole motor vehicles, which would then be used to commit other crimes including burglaries, thefts, eluding, and attempted homicide. Enterprise members often attached stolen and /or unauthorized license plates to the stolen vehicles.

11. Enterprise members traded or sold stolen property in order to obtain controlled substances, including, but not limited to, heroin and methamphetamine.

12. During all times relevant to this Indictment, members of the enterprise shared money, proceeds from the sale of stolen property, stolen property, stolen identification documents, stolen financial transaction devices, stolen automobiles, transportation, food, clothing, and living quarters to accomplish the enterprise's goals.

13. During all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$60,000.00 worth of property, exclusive of motor vehicles.

14. During all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$294,000.00 worth of motor vehicles.

COUNT TWO
IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about July 10, 2018, at or triable in the City and County of Denver, State of Colorado, **KASEE RAE DELA-TORRE** and **JOSEPH JAMES KING** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT THREE
FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about July 10, 2018, at or triable in the City and County of Denver, State of Colorado, **KASEE RAE DELA-TORRE** and **JOSEPH JAMES KING** with the intent to defraud [REDACTED] and **CANVAS CREDIT UNION**, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: **CHECK # [REDACTED] of [REDACTED]** in violation of section 18-5-102(1)(c), C.R.S.

COUNT FOUR
THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12>

On or about July 10, 2018, at or triable in the City and County of Denver, State of Colorado, **KASEE RAE DELA-TORRE** and **JOSEPH JAMES KING** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: **MONEY of CANVAS CREDIT UNION**, with the value of seven hundred fifty dollars or more but less than two thousand dollars, and intended to deprive **CANVAS CREDIT UNION** permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(e), C.R.S.

COUNT FIVE
IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about July 13, 2018, at or triable in the City and County of Denver, State of Colorado, **KASEE RAE DELA-TORRE** and **JOSEPH JAMES KING** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIX

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about July 13, 2018, at or triable in the City and County of Denver, State of Colorado, **KASEE RAE DELA-TORRE** and **JOSEPH JAMES KING** with the intent to defraud [REDACTED], [REDACTED], and **CANVAS CREDIT UNION**, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a check, deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: **CHECK # [REDACTED]** of [REDACTED], in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 2 through 6 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 13, 2018, as-yet unidentified enterprise members unlawfully, feloniously, and knowingly entered [REDACTED] 1998 Subaru, parked in the apartment complex lot located at [REDACTED] S. Acoma Street, Englewood, Arapahoe County, Colorado, and stole a purse, wallet, personal and financial identifying documents and information, valued at \$1,800.00. Among the documents stolen were Ms. [REDACTED] Colorado Driver's license, Social Security Card, and Public Service Credit Union (now known as Canvas Credit Union) debit card.
3. On or about July 10, 2018, Kasee Rae Dela-Torre, in association with the enterprise and in the presence of Joseph James King, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Ms. [REDACTED] to cash a stolen check made payable in the name of [REDACTED] for \$800.00 at the Canvas Credit Union located at 511 E. 120th Avenue, Northglenn, Adams County, Colorado. That check, # [REDACTED] drawn on the account of [REDACTED], had been stolen from Mr. [REDACTED]'s residence located at [REDACTED] Bryant Street, Denver, Colorado. Kasee Rae Dela-Torre identified herself as [REDACTED] during that transaction.
4. On or about July 13, 2018, Kasee Rae Dela-Torre, in association with the enterprise and in the presence of Joseph James King, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Ms. [REDACTED] to attempt to cash a stolen check made payable in the name of [REDACTED] for \$800.00 at the Canvas Credit Union located at 5800 S. Broadway, Littleton, Arapahoe County, Colorado. That check, # [REDACTED] drawn on the account of [REDACTED] had been stolen from Ms. [REDACTED]'s purse. Kasee Rae Dela-Torre identified herself as [REDACTED] during that transaction.
5. On or about July 29, 2018, Joseph James King was arrested by Lakewood, Colorado Police officers for possessing a stolen motorcycle. At that time, Joseph James King possessed additional counterfeit checks made payable to [REDACTED] and a stolen authentic credit card letter addressed to [REDACTED].

6. On or about September 14, 2018, Ms. [REDACTED]'s stolen Social Security Card was recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 86 of this Indictment.

COUNT SEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4) <0804H >

Between and including July 21, 2018 and August 28, 2018, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of INTERSTATE FORD and retained possession of motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT EIGHT

SECOND DEGREE FORGERY, 18-5-104;42-7-301.5(1) C.R.S. (M1) <10032>

On or about July 21, 2018, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully and knowingly presented an altered or counterfeit letter or insurance identification card, for the purposes of proving financial responsibility; in violation of sections 18-5-104 and 42-7-301.5(1), C.R.S.

The facts supporting Counts 7 and 8 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about July 21, 2018, Matthew Wade Turkett, in association with the enterprise, purchased a 2014 Ford Raptor pick-up truck for \$34,978.00 from Interstate Ford car dealership located at 800 Bryan Court, Dacono, Weld County, Colorado. Mr. Turkett paid for the truck with check # [REDACTED] drawn on Mr. Turkett's personal checking account at American National Bank and Trust. That checking account had been closed and charged off by the bank prior to Mr. Turkett writing the check to Interstate Ford. Mr. Turkett knew that the check would be returned unpaid when he issued it to the Ford dealership and took possession of the truck.**
- 3. As part of the transaction, Mr. Turkett uttered a counterfeit Progressive Insurance proof of insurance form to Interstate Ford.**
- 4. Mr. Turkett kept the truck until it was recovered by Interstate Ford on or about August 28, 2018. Interstate Ford recovered the truck from Mr. Turkett's residence located at 14310 Wright Way in Broomfield, Colorado.**

COUNT NINE

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about August 21, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about August 21, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY with the intent to defraud [REDACTED], and MICRO CENTER, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: CREDIT CARD of [REDACTED]; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ELEVEN

THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12>

On or about August 21, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: COMPUTER EQUIPMENT of MICRO CENTER, with the value of seven hundred fifty dollars or more but less than two thousand dollars, and intended to deprive MICRO CENTER permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(e), C.R.S.

The facts supporting Counts 9, 10 and 11 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 16, 2018, as-yet unidentified enterprise members stole mail from [REDACTED]' mailbox located at [REDACTED] S. Columbine Lane, Arapahoe County, Colorado. Among the documents stolen were personal and financial identifying documents belonging to Mr. [REDACTED] and his company, [REDACTED], including checks and a credit card.
3. On or about August 21, 2018, Jonathan Wray Hovey, in association with the enterprise and in the presence of an as-yet unidentified female, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device

of [REDACTED], including, but not limited to a credit card, to fraudulently purchase an Acer laptop and other computer equipment at Micro Center located at 8000 E. Quincy Avenue, City and County of Denver, Colorado. The amount of the fraudulent transactions was \$1,509.18.

4. On or about September 14, 2018, personal and financial identifying information and documents for Mr. [REDACTED] company, [REDACTED], were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 91 of this Indictment.

COUNT TWELVE

SECOND DEGREE BURGLARY, 18-4-203(1),(2)(a) C.R.S. (F3) <06032>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, **JOHN CHRISTOPHER GARCIA** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of [REDACTED] and [REDACTED], located at [REDACTED] **CORRINE COURT, BROOMFIELD, COLORADO** with the intent to commit therein the crime of **THEFT**; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTEEN

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, **JOHN CHRISTOPHER GARCIA** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FOURTEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, **JOHN CHRISTOPHER GARCIA** with the intent to defraud [REDACTED] and **WAL-MART**, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: **CREDIT CARD OF [REDACTED]** in violation of section 18-5-102(1)(c), C.R.S.

COUNT FIFTEEN

THEFT, 18-4-401(1),(2)(d) C.R.S. (M2) <08A11>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, **JOHN CHRISTOPHER GARCIA** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: **GIFT CARDS of WAL-MART**, with the value of three hundred dollars or more but less than seven hundred fifty dollars, and intended to deprive **WAL-MART** permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S.

The facts supporting Counts 12 through 15 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about August 29, 2018, John Christopher Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly, entered [REDACTED] and [REDACTED]'s attached garage located at [REDACTED] Corrine Court, Broomfield, Colorado.**
- 3. John Christopher Garcia, in association with the enterprise, stole a purse, keys, personal and financial identifying information and documents, and financial devices from the [REDACTED]' 2015 Honda Odyssey parked in the garage. The value of the items stolen was approximately \$420.00.**
- 4. Shortly after burglarizing the [REDACTED]' garage, John Christopher Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial devices of [REDACTED] including, but not limited to a credit card, to fraudulently purchase gift cards, and attempt to purchase additional gift cards, at Wal-Mart located at 4651 W. 121st Avenue, Broomfield, Colorado. The amount of the successfully completed fraudulent transactions was \$519.00.**
- 5. On or about September 14, 2018, personal and financial identifying information and documents stolen from the [REDACTED] during the burglary were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 34 of this Indictment.**

COUNT SIXTEEN

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SEVENTEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about August 29, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY with the intent to defraud [REDACTED] and Z CASINO, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: COUNTERFEIT CHECK and/or COUNTERFEIT DRIVER'S LICENSE IN THE NAME OF [REDACTED]; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 16 and 17 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 16, 2018, as-yet unidentified enterprise members stole mail from [REDACTED]' mailbox located at [REDACTED] S. Columbine Lane, Arapahoe County, Colorado. Among the documents stolen were personal and financial identifying documents belonging to Mr. [REDACTED] and his company, [REDACTED], including checks and a credit card.
3. On or about August 29, 2018, Jonathan Wray Hovey, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] including, but not limited to a counterfeit driver's license and counterfeit check, to attempt to open an account at the Z Casino located at 8 101 Gregory Street, Black Hawk, Gilpin County, Colorado.
4. On or about September 14, 2018, personal and financial identifying information and documents for Mr. [REDACTED]' company, [REDACTED] were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 91 of this Indictment.

COUNT EIGHTEEN

SECOND DEGREE BURGLARY, 18-4-203(1),(2)(a) C.R.S. (F3) <06032>

On or about September 1, 2018, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of [REDACTED], located at [REDACTED] **COLUMBINE COURT, BROOMFIELD, COLORADO** with the intent to commit therein the crime of **AGGRAVATED MOTOR VEHICLE THEFT**; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT NINETEEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4) <0804H >

Between and including September 1, 2018 and September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The facts supporting Counts 18 and 19 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 1, 2018, Matthew Wade Turkett, in association with the enterprise, unlawfully, feloniously, and knowingly, entered [REDACTED]'s attached garage located at [REDACTED] Columbine Court, Broomfield, Colorado.
3. Matthew Wade Turkett, in association with the enterprise, stole a 2005 Porsche 911 automobile that was parked in Mr. [REDACTED]'s garage. The value of the stolen Porsche was approximately \$31,900.00.
4. Matthew Wade Turkett, in association with the enterprise, drove the stolen Porsche and unlawfully attached or otherwise displayed in or upon the motor vehicle Oregon license plate number [REDACTED] that had been stolen from another vehicle.
5. On or about September 14, 2018, Mr. [REDACTED]'s stolen Porsche, personal and financial identifying information, and financial devices stolen from Mr. [REDACTED] during the burglary were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 41 of this Indictment.

COUNT TWENTY

FIRST DEGREE CRIMINAL TRESPASS, 18-4-502 C.R.S. (F5) <09023>

On or about September 3, 2018, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** unlawfully, feloniously, and knowingly entered the motor vehicle of [REDACTED] with intent to commit therein the crime of **THEFT**; in violation of section 18-4-502, C.R.S.

COUNT TWENTY-ONE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G>

Between and including September 3, 2018 and September 8, 2018, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Counts 20 and 21 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 3, 2018, Cory Roger Halvorson, in association with the enterprise, unlawfully, feloniously, and knowingly entered [REDACTED]'s 2001 Honda Civic, located on the street in front of [REDACTED] Craftsman Way, Broomfield, Colorado, and stole a camera, electronic equipment and car cleaning supplies. The stolen items were valued at \$165.00.
3. On or about September 3, 2018, Cory Roger Halvorson, in association with the enterprise, stole [REDACTED]'s 1996 Honda Civic automobile that was located at [REDACTED] Ladies' Treasures Place, Broomfield, Colorado. The value of the stolen Honda was approximately \$2,000.00. A "Marin" brand bicycle valued at \$1,100.00 was in Mr. [REDACTED]'s Honda when the Honda was stolen.
4. On or about September 8, 2018, Mr. [REDACTED]'s stolen 1996 Honda was recovered in a parking lot located at Pasadena Way and Wright Way, Broomfield, Colorado.
5. On or about September 14, 2018, Mr. [REDACTED]'s stolen "Marin" brand bicycle was recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 29 of this Indictment.

COUNT TWENTY-TWO

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a)
C.R.S. (F5) <0804G >**

Between and including September 3, 2018 and September 14, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Count 22 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 3, 2018, Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, entered AutoNation Honda car dealership located at 2999 W. 104th Avenue, Westminster, Adams County, Colorado.
3. [REDACTED] was [REDACTED] at AutoNation Honda. Jonathan Wray Hovey and Matthew Wade Turkett stole Saab car keys from [REDACTED].
4. Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, stole [REDACTED]'s 2011 Saab 93 automobile. The value of the stolen Saab was approximately \$11,000.00.
5. Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, drove the stolen Saab and unlawfully attached or otherwise displayed in or upon the motor vehicle Colorado license plate number [REDACTED] that had been stolen from another vehicle.
6. On or about September 14, 2018, Mr. [REDACTED]'s stolen Saab and personal and financial identifying information and documents stolen from Mr. [REDACTED]'s Saab were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 58 of this Indictment.

COUNT TWENTY-THREE

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

On or about September 8, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY-FOUR

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about September 7, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY with the intent to defraud [REDACTED], BARCLAY'S, WAL-MART, and KING SOOPERS, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: BARCLAY'S CREDIT CARD of [REDACTED]; in violation of section 18-5-102(1)(c), C.R.S.

COUNT TWENTY-FIVE

THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12>

On or about September 8, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: MONEY and MERCHANDISE of WAL-MART and KING SOOPERS, with the value of seven hundred fifty dollars or more but less than two thousand dollars, and intended to deprive WAL-MART and KING SOOPERS permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(e), C.R.S.

The facts supporting Counts 23, 24 and 25 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. In the early morning of September 7, 2018, an as-yet unidentified enterprise member or members, in association with the enterprise, unlawfully, feloniously, and knowingly, entered [REDACTED] and [REDACTED]'s dwelling located at [REDACTED] S Pontiac Court, Centennial, Arapahoe County, Colorado.

3. The enterprise member or members stole a purse, keys, cash, watches, a computer, prescription drugs, gift cards, sunglasses, a Samsung television, hearing aids, personal and financial identifying documents, and financial devices. The value of the stolen property was approximately \$9,285.00.

4. The enterprise member or members also stole [REDACTED]'s 2015 Nissan Rogue automobile that was parked in the garage. The value of the stolen Nissan Rogue was approximately \$19,500.00.

5. On or about the late night of September 7, 2018 Jonathan Wray Hovey, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial devices of [REDACTED] including, but limited to a credit card, to fraudulently purchase merchandise at the Wal-Mart store located at 200 W. 136th Avenue in Westminster, Colorado, and then at the King Soppers store located at 1891 State Highway 7, Erie, Weld County, Colorado. The value of the fraudulent transactions was \$1,324.76.

6. On or about September 14, 2018, personal and financial identifying information and documents, and financial devices stolen from [REDACTED] and [REDACTED] during the burglary were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 88 of this Indictment.

COUNT TWENTY-SIX

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G>

Between and including September 8, 2018 and September 12, 2018, at or triable in the City and County of Denver, State of Colorado, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY-SEVEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including September 8, 2018 and September 12, 2018, at or triable in the City and County of Denver, State of Colorado, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT with the intent to defraud [REDACTED], CITIBANK, and VARIOUS MERCHANTS, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: CITIBANK CREDIT CARD OF [REDACTED]; in violation of section 18-5-102(1)(c), C.R.S.

COUNT TWENTY-EIGHT

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13>

Between and including September 8, 2018 and September 12, 2018, at or triable in the City and County of Denver, State of Colorado, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: MONEY and MERCHANDISE, of FINISH LINE, KUM & GO, BOOT BARN, WAL-MART, EXPERIAN, GEMINI FOOD MART, DICK'S SPORTING GOODS, THE BUCKLE, SALLY BEAUTY SUPPLY, SMASHBURGER, KING SOOPERS, 7-ELEVEN and OLD CHICAGO, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive FINISH LINE, KUM & GO, BOOT BARN, WAL-MART, EXPERIAN, GEMINI FOOD MART, DICK'S SPORTING GOODS, THE BUCKLE, SALLY BEAUTY SUPPLY, SMASHBURGER, KING SOOPERS, 7-ELEVEN and OLD CHICAGO permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

The facts supporting Counts 26, 27 and 28 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by

reference.

2. In late August or early September 2018, CitiBank mailed a MasterCard credit card to [REDACTED] at her residence located at [REDACTED] Olympia Court, Broomfield, Colorado. The last four numbers of that credit card account were [REDACTED]. That credit card was stolen from the United States Postal Service delivery system.

3. Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] including, but limited to a credit card, to fraudulently make purchases using that stolen CitiBank MasterCard at the merchants noted in the following chart:

Date	Time	Location	Property	Transaction Value
9/8/2018	Undetermined	Finish Line #0862- Orchard Town Center, Westminster, CO	Merchandise	\$108.58
9/10/2018	12:22	Kum & Go #0916 - 2999 Bonanza Dr., Erie, CO	Food	\$6.70
9/10/2018	13:07	Boot Barn 14384 Lincoln Street, Thornton, CO	Clothes	\$766.90
9/10/2018	13:50	Wal-Mart 200 W, 136th Ave., Westminster, CO	Electronics	\$160.73
9/10/2018	Undetermined	Experian Credit Report	Credit Report	\$1.00
9/10/2018	Undetermined	Gemini Food Mart - 2315 W. 92nd Ave., Federal Heights, CO	Merchandise	\$83.65
9/10/2018	Undetermined	Dick's Sporting Goods 31 West Flatiron Crossing Drive, Broomfield, CO	Merchandise	\$86.46
9/11/2018	13:10	Wal-Mart #5341 500 Summit Blvd, Broomfield, CO	Electronics	\$257.28
9/11/2018	14:43	The Buckle - 1 Flatiron Crossing Dr. #1084, Broomfield, CO	Clothes	\$304.96
9/11/2018	Undetermined	Sally Beauty Supply #10482- Lafayette, CO	Merchandise	\$7.77
9/11/2018	Undetermined	Smashburger #1016 - 1650 28th Street #1226, Boulder, CO	Food	\$30.12
9/11/2018	Undetermined	King Soopers #0135 - 480 N HWY 287 Lafayette, CO	Merchandise	\$53.52
9/12/2018	23:56	7-Eleven #39742 - 4175 W. 120th Ave., Broomfield, CO	Marlboro Black Cigarettes, food	\$95.91
9/12/2018	Undetermined	Old Chicago 1280 E 1st Ave, Broomfield, CO	Food	\$42.94
TOTAL				\$2,006.52

4. On or about September 14, 2018, the original letter that contained [REDACTED]'s CitiBank MasterCard that was stolen from the mail was recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 50 of this Indictment.

COUNT TWENTY-NINE

THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over, or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: BICYCLE of [REDACTED], with the value of seven hundred fifty dollars or more but less than two thousand dollars, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(e), C.R.S.

COUNT THIRTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of AMPLYFY INVESTMENTS LLC without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **BUSINESS CHECK NOW, INC** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of DENVER INTERMODAL EXPRESS INC without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **FAIRFIELD PEAKVIEW LLC** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **FAMILY SUPPORT REGISTRY** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FORTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] COMPANY and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **LINCOLN HOLDINGS, LLC** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MARKET PLACE REALTY, LLC** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MATTERHORN INN OURAY, LLC** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MENDOZA DEMOLITION SERVICES** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MOTION AND FLOW CONTROL PRODUCTS** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of POSITIVE ALTERNATE PRESCHOOL AND CHILDCARE without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SEVENTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of RELIASTAR LIFE INSURANCE without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of SALEM TIRE CENTER without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT EIGHTY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-ONE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-TWO

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of SONIC AUTOMOTIVE, INC. without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-THREE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-FOUR

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-FIVE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-SIX

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] and [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-SEVEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-EIGHT

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT NINETY-NINE

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED

POSSESSION OF IDENTITY THEFT TOOLS, 18-5-905 C.R.S. (F5) <13085>

On or about September 14, 2018, at or triable in the City and County of Denver, State of Colorado, **MAREN RAQUEL GASSER, JONATHAN WRAY HOVEY and MATTHEW WADE TURKETT** unlawfully and feloniously possessed tools, equipment, computer, computer network, scanner, printer, or other article adapted, designed, or commonly used for committing or facilitating the commission of the offense of identity theft, and intended to use the thing possessed, or knew that a person intended to use the thing possessed, in the commission of the offense of identity theft; in violation of section 18-5-905, C.R.S.

The facts supporting Counts 29 through 100 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 14, 2018, Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett resided at 14130 Wright Way in the City and County of Broomfield, State of Colorado.
3. As noted in the facts supporting Count 22 of this Indictment, Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, stole [REDACTED]'s 2011 Saab 93 automobile. On September 14, 2018, Broomfield Police Officers recovered Mr. [REDACTED]'s stolen Saab 93 from the street in front of 14310 Wright Way.
4. As noted in the facts supporting Counts 18 and 19 of this Indictment, Matthew Wade Turkett, in association with the enterprise, stole Mr. [REDACTED]'s 2005 Porsche 911 automobile that was parked in Mr. [REDACTED]'s garage. On September 14, 2018, Broomfield Police Officers recovered Mr. [REDACTED]'s stolen Porsche 911 from the attached garage at 14310 Wright Way.
5. As noted in the facts supporting Count 21 of this Indictment, on or about September 3, 2018, Cory Roger Halvorson, in association with the enterprise, stole [REDACTED]'s 1996 Honda Civic automobile. A "Marin" brand bicycle valued at \$1,100.00 was in Mr. [REDACTED]'s Honda when the Honda was stolen. On September 14, 2018, Mr. [REDACTED]'s stolen "Marin" brand bicycle was recovered from the living room area of 14130 Wright Way in the City and County of Broomfield, Colorado.
6. On September 14, 2018, Broomfield Police Officers searched 14130 Wright Way and found that Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial devices of the victims named in Counts 30 through 99 of this indictment, without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment. At all times relevant to this Indictment, many of those victims resided and / or received mail in the City and County of Denver, State of Colorado.
7. On September 14, 2018, Broomfield Police Officers searched 14130 Wright Way, and found that Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, in association with the enterprise, unlawfully and feloniously possessed tools, equipment, computers, scanners, printers, and other articles adapted, designed, or commonly used for committing or facilitating the commission of the offense of identity theft, and intended to use these things in the commission of the offense of identity theft. Those items included, but were not limited to: computers, printers, check-making software, blank magnetic striped plastic cards, laminators, checks and check stock.

COUNT ONE HUNDRED ONE

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5)
C.R.S. (F4) <0804H >**

Between and including November 16, 2018 and December 3, 2018, at or triable in the City and County of Denver, State of Colorado, MAREN RAQUEL GASSER and MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of JOHNSON AUTO PLAZA, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The facts supporting Count 101 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about November 16, 2018, Maren Raquel Gasser and Matthew Wade Turkett, in association with the enterprise, purchased a 2016 GMC Sierra pick-up truck for \$51,485.50 from Johnson Auto Plaza located at 12410 E. 136th Avenue in Brighton, Adams County, Colorado. Ms. Gasser paid for the truck with check # [REDACTED] drawn on Ms. Gasser's personal checking account at First National Bank. Ms. Gasser knew that her checking account did not have sufficient funds to cover the check when she issued it to Johnson Auto Plaza. Maren Raquel Gasser and Matthew Wade Turkett took possession of the truck.**
- 3. Maren Raquel Gasser and Matthew Wade Turkett kept the truck until it was recovered by Brighton and Broomfield Police officers on or about December 3, 2018, at their residence located at 14310 Wright Way in the City and County of Broomfield, Colorado.**

COUNT ONE HUNDRED TWO

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a)
C.R.S. (F5) <0804G >**

Between and including November 20, 2018 and February 1, 2019, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT and BRETT ALAN CRAVENS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Count 102 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 20, 2018, Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, stole [REDACTED]'s 2007 Toyota Camry automobile from [REDACTED] Autumn Court, Erie, Boulder County, Colorado. The value of the stolen Toyota was approximately \$3,000.00.
3. Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, unlawfully attached or otherwise displayed in or upon the motor vehicle a Wisconsin license plate that was not officially issued for the motor vehicle.
4. On or about February 1, 2019, the stolen Toyota Camry was recovered by Arvada Police officers.

COUNT ONE HUNDRED THREE

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about December 18, 2018, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **EZ PAWN #40301**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **SUNGLASSES**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT ONE HUNDRED FOUR

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about December 20, 2018, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **FAST CASH #405**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **MAKITA DRILL and BOSCH LASER LEVEL**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT ONE HUNDRED FIVE

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about January 30, 2019, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **EZ PAWN #40301**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **SUNGLASSES**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT ONE HUNDRED SIX

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about February 6, 2019, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **EZ PAWN #40103**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **ENGINE ANALYZER and ELECTRONIC TOOLS**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT ONE HUNDRED SEVEN

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about February 12, 2019, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **FAST CASH #400**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **HAND TOOLS** and **MAKITA DRILL**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT ONE HUNDRED EIGHT

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) (F6) <41105>

On or about February 13, 2019, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS**, a customer of **EZ PAWN #40301**, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: **SPYDERCO KNIFE**; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

The facts supporting Counts 103 through 108 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including December 18, 2018 and February 13, 2019, Brett Alan Cravens, in association with the enterprise, stole property, or knowingly received stolen property from Matthew Wade Turkett.
3. Brett Alan Cravens unlawfully, feloniously, and knowingly gave false information regarding his ownership and / or length of ownership to various pawnbrokers and sold that stolen property to various pawnbrokers located in the State of Colorado as noted in the following chart:

Date	Time	Location	Stolen Property	Stolen Property / Transaction Value
12/18/2018	19:03	EZ Pawn #40301 9052 N. Federal Blvd., Federal Heights	Rayban sunglasses	\$17.00
12/20/2018	15:07	Fast Cash #405 6650 W. 120th Ave. #A-12, Broomfield	Makita Drill, Bosch Laser Level	\$30.00
1/30/2019	18:39	EZ Pawn #40301 9052 N. Federal Blvd., Federal Heights	Rayban sunglasses	\$20.00

Date	Time	Location	Stolen Property	Stolen Property / Transaction Value
2/6/2019	16:25	EZ Pawn #40103 4595 Wadsworth Blvd., Wheat Ridge	Engine Analyzer, electronic Tools	\$80.00
2/12/2019	11:47	Fast Cash #400 9120 Federal Blvd., Federal Heights	Cobra Hand tools, Makita Drill	\$80.00
2/13/2019	13:00	EZ Pawn #40301 9052 N. Federal Blvd., Federal Heights	Spyderco Knife	\$50.00

COUNT ONE HUNDRED NINE

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5)
C.R.S. (F4) <0804H >**

Between and including December 28, 2018 and February 14, 2019, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT and BRETT ALAN CRAVENS unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] and [REDACTED] without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT ONE HUNDRED TEN

THEFT, 18-4-401(1),(2)(c) C.R.S. (M3) <0801Z>

On or about January 6, 2019, at or triable in the City and County of Denver, State of Colorado, BRETT ALAN CRAVENS unlawfully, and knowingly, took a thing of value, namely: TWO AIR-POWERED PISTOLS of SCHEEL'S SPORTING GOODS, with the value of fifty dollars or more but less than three hundred dollars; in violation of section 18-4-401(1),(2)(c),(6) C.R.S.

COUNT ONE HUNDRED ELEVEN

THEFT, 18-4-401(1),(2)(c) C.R.S. (M3) <0801Z>

On or about January 12, 2019, at or triable in the City and County of Denver, State of Colorado, BRETT ALAN CRAVENS unlawfully, and knowingly, took a thing of value, namely: AUTOMOBILE PARTS AND TOOLS, of AUTO ZONE, with the value of fifty dollars or more but less than three hundred dollars; in violation of section 18-4-401(1),(2)(c),(6) C.R.S.

The facts supporting Counts 109, 110 and 111 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 28, 2018, Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, stole [REDACTED] and [REDACTED]'s 2016 Audi S3 automobile from the Big O Tire Store located at 6430 W. 120th Avenue, City and County of Broomfield, Colorado. The value of the stolen Audi S3 was approximately \$33,000.00.
3. Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, unlawfully attached or otherwise displayed in or upon the motor vehicle various license plates that were not officially issued for the motor vehicle.

4. On or about January 6, 2019, Brett Alan Cravens, in association with the enterprise, stole two air-powered pistols valued at \$119.98 from the Scheel's Sporting Goods store located at 4755 Ronald Reagan Drive, Johnstown, Larimer County, Colorado. Brett Alan Cravens fled from the Scheel's after committing the theft by driving away in the [REDACTED]'s stolen Audi S3.

5. On or about January 12, 2019, Brett Alan Cravens, in association with the enterprise, stole auto parts and tools valued at approximately \$300.00 from the Auto Zone store located at 3701 Kipling Street, Wheat Ridge, Jefferson County, Colorado. Brett Alan Cravens fled from the Auto Zone after committing the theft by driving away in the [REDACTED]'s stolen Audi S3.

6. On or about February 14, 2019, the stolen Audi S3 was recovered by Golden Police officers.

7. From time to time, Brett Alan Cravens, in association with the enterprise, hid the stolen Audi S3 in the garage of [REDACTED] located at [REDACTED] Andes Way in the City and County of Denver, State of Colorado.

COUNT ONE HUNDRED TWELVE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G >

Between and including January 14, 2019 and January 15, 2019, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT ONE HUNDRED THIRTEEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about January 15, 2019, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** and **SARAH MARIE LORE** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED FOURTEEN

POSSESSION OF A CONTROLLED SUBSTANCE, 18-18-403.5(1),(2)(a) C.R.S. (DF4) <§101B >

On or about January 15, 2019, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** and **SARAH MARIE LORE** unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained **METHAMPHETAMINE**, a schedule I or II controlled substance; in violation of section 18-18-403.5(1),(2)(a), C.R.S. Further, the amount possessed was more than 2 grams per 18-13-103.5(3)(a).

The facts supporting Counts 112, 113 and 114 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 14, 2019, Cory Roger Halvorson, in association with the enterprise, stole [REDACTED]'s 1991 Honda station wagon automobile from [REDACTED] W. Floyd Avenue in the City and County of Denver, Colorado. The value of the stolen Honda station wagon was approximately \$1,500.00.
3. On or about January 15, 2019, Denver Police Department officers contacted Cory Roger Halvorson and Sarah Marie Lore inside Mr. [REDACTED]'s stolen Honda station wagon in the alleyway behind 2759 W. 4th Avenue in the City and County of Denver, Colorado. At that time,

Cory Roger Halvorson and Sarah Marie Lore, in association with the enterprise, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial devices of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment.

4. On or about January 15, 2019, Denver Police Department officers contacted Cory Roger Halvorson and Sarah Marie Lore inside Mr. [REDACTED]'s stolen Honda station wagon in the alleyway behind 2759 W. 4th Avenue in the City and County of Denver, Colorado. At that time, Cory Roger Halvorson and Sarah Marie Lore, in association with the enterprise, unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained more than four grams of Methamphetamine.

COUNT ONE HUNDRED FIFTEEN
VEHICULAR ELUDING, 18-9-116.5 C.R.S. (F5) <27162>

On or about January 24, 2019, at or triable in the City and County of Denver, State of Colorado, **BRETT ALAN CRAVENS** while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude **JOHNSTOWN POLICE OFFICER CHRISTIAN OTERO**, a peace officer also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

The facts supporting Count 115 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. As noted in the facts supporting Count 109 of this Indictment, Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, stole [REDACTED] and [REDACTED]'s 2016 Audi S3 automobile. Matthew Wade Turkett and Brett Alan Cravens unlawfully attached or otherwise displayed in or upon the motor vehicle various license plates that were not officially issued for the motor vehicle.
3. On or about January 24, 2019, Brett Alan Cravens, in association with the enterprise, was parked in the [REDACTED]'s stolen Audi S3 outside of the Scheels Sporting Goods store located at 4755 Ronald Reagan Drive, Johnstown, Larimer County, Colorado. Johnstown Police Officer Christian Otero was in a marked Johnstown Police Department patrol car and attempted to contact Brett Alan Cravens. Officer Otero activated the patrol vehicle's emergency equipment, and Brett Alan Cravens fled, operating the stolen Audi S3 in a reckless manner.
4. At that time, the stolen Audi S3 displayed Colorado license plate number [REDACTED]. That license plate had been stolen from another vehicle.

COUNT ONE HUNDRED SIXTEEN

THEFT, 18-4-401(1),(2)(c) C.R.S. (M3) <0801Z>

On or about January 29, 2019, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT and BRETT ALAN CRAVENS** unlawfully, and knowingly, took a thing of value, namely: **VAPE KIT OF PARADISE SMOKE SHOP**, with the value of fifty dollars or more but less than three hundred dollars; in violation of section 18-4-401(1),(2)(c),(6) C.R.S.

The facts supporting Count 116 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. As noted in the facts supporting Count 109 of this Indictment, Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, stole [REDACTED] and [REDACTED]'s 2016 Audi S3 automobile. Matthew Wade Turkett and Brett Alan Cravens unlawfully attached or otherwise displayed in or upon the motor vehicle various license plates that were not officially issued for the motor vehicle.
3. On or about January 29, 2019, Matthew Wade Turkett and Brett Alan Cravens, in association with the enterprise, stole a Vape Kit valued at \$109.99 from the Paradise Smoke Shop located at 1546 28th Street in Boulder County, Colorado. Brett Alan Cravens fled from the Paradise Smoke Shop after committing the theft by driving away in the [REDACTED]'s stolen Audi S3. Matthew Wade Turkett fled from the Paradise Smoke Shop after committing the theft by driving away in Maren Raquel Gasser's Jeep Grand Cherokee.

COUNT ONE HUNDRED SEVENTEEN

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (P4) <1307H>

On or about February 19, 2019, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

The facts supporting Count 117 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 19, 2019, Denver Police Department officers contacted Matthew Wade Turkett driving Maren Raquel Gasser's Jeep Grand Cherokee on 33rd Avenue and Peoria Street in the City and County of Denver, Colorado. At that time, Matthew Wade Turkett, in association with the enterprise, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial devices of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment.
3. On or about September 14, 2018, personal and financial identifying information, and financial devices stolen from Mr. [REDACTED] were recovered from the residence of Maren Raquel Gasser, Jonathan Wray Hovey and Matthew Wade Turkett, located at 14130 Wright Way in Broomfield, Colorado, as noted in the facts supporting Count 90 of this Indictment.

COUNT ONE HUNDRED EIGHTEEN

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5)
C.R.S. (F4) <0804H >**

Between and including February 25, 2019 and March 6, 2019, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of POLLARD JEEP OF BOULDER, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The facts supporting Count 118 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about February 25, 2019, Matthew Wade Turkett, in association with the enterprise, stole a 2017 Jeep Grand Cherokee automobile from the Pollard Jeep of Boulder auto dealership located at 5075 Pearl Parkway, Boulder County, Colorado. The value of the stolen Jeep Grand Cherokee was approximately \$31,980.00.**
- 3. Matthew Wade Turkett, in association with the enterprise, unlawfully attached or otherwise displayed in or upon the motor vehicle a stolen Colorado license plate, number [REDACTED], that was not officially issued for the motor vehicle.**
- 4. On or about March 6, 2019, the stolen Jeep Grand Cherokee was recovered by police officers at the Kohl's parking lot located at 919 W. Dillon Rd., Louisville, Boulder County, Colorado.**

COUNT ONE HUNDRED NINETEEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4) <0804H >

On or about February 26, 2019, at or triable in the City and County of Denver, State of Colorado, **CORY ROGER HALVORSON** and **SARAH MARIE LORE** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception and used the motor vehicle in the commission of the crime of **ATTEMPTED MURDER** as set forth in section 18-3-102(1)(a); 18-2-101 C.R.S. and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT ONE HUNDRED TWENTY

CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, 18-3-102(1)(a); 18-2-101 C.R.S. (F2) <01011A>

On or about February 26, 2019, at or triable in the City and County of Denver, State of Colorado, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, **CORY ROGER HALVORSON** unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of **RICHARD ISNETTO**; in violation of sections 18-3-102(1)(a) and 18-2-101, C.R.S.

The facts supporting Counts 119 and 120 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 26, 2019, Cory Roger Halvorson and Sarah Marie Lore, in association with the enterprise, stole [REDACTED]'s 2018 Subaru WRX automobile from [REDACTED] Lewis St, Arvada, Jefferson County, Colorado. The value of the stolen Subaru WRX was approximately \$36,000.00.
3. On or about February 26, 2019, Sheridan Police Detective Richard Isnetto and other Sheridan Police officers located Ms. [REDACTED]'s stolen Subaru WRX parked on the street in front of 4172 S. Eliot Street in Sheridan, Arapahoe County, Colorado. Cory Roger Halvorson was the driver and Sarah Marie Lore was in the front passenger seat.
4. On or about February 26, 2019, Cory Roger Halvorson used [REDACTED]'s stolen 2018 Subaru WRX automobile as a deadly weapon and unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of Sheridan Police Detective Richard Isnetto by attempting to run over Detective Isnetto. Cory Roger Halvorson and Sarah Marie Lore fled from the Sheridan police officers.

5. On or about February 26, 2019, Ms. [REDACTED]'s stolen 2018 Subaru WRX automobile was recovered by Englewood police officers in the rear parking lot behind 801 Englewood Parkway, Englewood, Arapahoe County, Colorado. Cory Roger Halvorson and Sarah Marie Lore fled from the WRX before the Englewood officers recovered the vehicle.

COUNT ONE HUNDRED TWENTY-ONE

THEFT, 18-4-401(1),(2)(d) C.R.S. (M2) <08A11>

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT** unlawfully, and knowingly, took a thing of value, namely: **CELL PHONE** of [REDACTED], with the value of three hundred dollars or more but less than seven hundred fifty dollars; and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S.

COUNT ONE HUNDRED TWENTY-TWO

SECOND DEGREE BURGLARY, 18-4-203(1) C.R.S. (F4) <06031>

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of **HOLIDAY INN**, located at **11401 VIA VARRA DRIVE, BROOMFIELD, COLORADO** with the intent to commit therein the crime of **THEFT**; in violation of section 18-4-203(1), C.R.S.

COUNT ONE HUNDRED TWENTY-THREE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G >

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, **MATTHEW WADE TURKETT** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of **ATTEMPTED MURDER** as set forth in section 18-3-102(1)(a);18-2-101, C.R.S, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT ONE HUNDRED TWENTY-FOUR

CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, 18-3-102(1)(a);18-2-101 C.R.S. (F2) <01011A>

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, by engaging in conduct constituting a substantial step toward the commission of murder in the first degree, **MATTHEW WADE TURKETT** unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than himself, attempted to cause the death of [REDACTED]; in violation of sections 18-3-102(1)(a) and 18-2-101, C.R.S.

COUNT ONE HUNDRED TWENTY-FIVE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G >

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of AUTO TREK, without authorization, or by threat or deception and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT ONE HUNDRED TWENTY-SIX

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, 18-12-108(1) C.R.S. (F6) <3007A>

On or about March 7, 2019, at or triable in the City and County of Denver, State of Colorado, MATTHEW WADE TURKETT unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: KIMBER SEMI-AUTOMATIC HANDGUN, and MATTHEW WADE TURKETT was previously convicted of a felony, namely: THEFT OF PROPERTY FROM AN ELDERLY PERSON, as defined by TEXAS PENAL CODE 3103-F3, on APRIL 27, 2018; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 121 through 126 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about March 7, 2019, Matthew Wade Turkett, in association with the enterprise, stole [REDACTED] LG V20 Cell Phone valued at \$700.00 from Mr. [REDACTED]'s office at the [REDACTED] auto dealership located at [REDACTED] in the City and County of Broomfield, Colorado.
3. On or about March 7, 2019, Matthew Wade Turkett, in association with the enterprise, unlawfully, feloniously, and knowingly, entered the Holiday Inn located at 11401 Via Varra, Broomfield, Colorado. Matthew Wade Turkett stole keys from the front desk and unlawfully, feloniously, and knowingly, entered rooms 217, 218, 219, and 220 before leaving the hotel.
4. On or about March 7, 2019, Matthew Wade Turkett, in association with the enterprise, stole [REDACTED] (" [REDACTED] ") 2006 Chevrolet 2500 pick-up truck from [REDACTED] 96th Street, Broomfield, Colorado. The value of the stolen Chevrolet 2500 truck was approximately \$6,000.00. [REDACTED] heard his truck start up and attempted to stop Matthew Wade Turkett from stealing the truck.
5. On or about March 7, 2019, Matthew Wade Turkett used [REDACTED] stolen 2006 Chevrolet 255 pick-up truck as a deadly weapon and unlawfully, feloniously, after deliberation,

and with the intent to cause the death of a person other than himself, attempted to cause the death of [REDACTED] by attempting to run over [REDACTED]

6. On or about March 7, 2019, Mr. [REDACTED]'s stolen truck was recovered by Lafayette Police officers at 120th Street and Overlook Drive.

7. On or about March 7, 2019, Matthew Wade Turkett stole a Kimber semiautomatic handgun from [REDACTED]'s truck. That Kimber handgun was valued at approximately \$1,000.00.

8. On or about March 7, 2019, Matthew Wade Turkett, in association with the enterprise, stole a 2010 Jeep Commander automobile from the AutoTrek dealership located at 1222 Commerce Court, Lafayette, Boulder County, Colorado. The value of the stolen Jeep Commander was approximately \$10,700.00.

9. On or about March 7, 2019, Matthew Wade Turkett was located by Firestone police officers in Room #325 of the Best Western located at 11201 Business Park Circle in Firestone, Weld County, Colorado. Maren Raquel Gasser was also present in the room. AutoTrek's stolen Jeep Commander was recovered nearby.

10. [REDACTED]'s stolen handgun was located in Room #325.

11. Matthew Wade Turkett was previously convicted of a felony, namely: Theft of Property From an Elderly Person, as defined by Texas Penal Code 3103-F3, on April 27, 2018.