

District Court, City and County of Denver, Colorado
City and County Building, Room 424
1437 Bannock Street
Denver, CO 80202

**Plaintiff: THE PEOPLE OF THE STATE OF
COLORADO**

Defendants:

**THOMAS BRIDGES
BRITTANY GIARDINO
WILLIAM JOKAY-SZILAGJI
DONALD MCGRATH
SARAH MCGRATH
JEREMY RODGERS
JAMES SCOTT
KAREN ANDRES
ESTEVAN BARRIENTOS
ALBERTO BENIPAYO
WILLIAM CARSON
ALEXANDER COLE
ESSENCE FORSEY
MICHELE LILLA
KORY LOVE
JULIE MARTINEZ
NICOLE PEDROZA
ANTON PLEASANT
FREDERICK RICCIARDELLI
GERARDO SANCHEZ
ROBERT STANLEY
LEE SWINK
KEVIN WILLENBRECHT
JENNIFER WILLIAMSEN**

COURT USE ONLY

Case Number:

Grand Jury No. 19CR2A

Div.: Criminal Ctrm: 424

INDICTMENT

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

**CONSPIRACY TO COMMIT AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST
DEGREE, 18-4-409(2),(3)(b);18-2-201 C.R.S. (F4) <0804JC> 2 (1 count)**

**SECOND DEGREE BURGLARY, 18-4-203(1) C.R.S. (F4) <06031> 3, 5, 15, 36, 53, 69, 127,
137, 138 (9 counts)**

THEFT, 18-4-401(1),(2)(e) C.R.S. (M1) <08A12> 4, 7, 14 (3 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5) <0804G> 6, 12, 16, 19, 24, 26, 46, 54, 62, 66, 68, 92, 108, 123, 140, 150, 151 (17 counts)

CRIMINAL ATTEMPT TO COMMIT MURDER IN THE FIRST DEGREE, 18-3-102(1)(a);18-2-101 C.R.S. (F2) <01011A> 8, 10 (2 counts)

ASSAULT IN THE SECOND DEGREE, 18-3-203(1)(b) C.R.S. (F4) <0202L> 9, 11 (2 counts)

FIRST DEGREE CRIMINAL TRESPASS, 18-4-502 C.R.S. (F5) <09023> 13 (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) <41105> 17, 18 (2 counts)

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G> 20, 27, 28, 29, 30, 31, 32, 33, 34, 35, 40, 45, 96, 98, 100, 104, 106, 129, 130, 131, 132, 139, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169 (40 counts)

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C> 21, 41, 43, 44, 97, 99, 101, 105, 107, 110, 120 (11 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b) C.R.S. (F6) <0804E> 22, 47 (2 counts)

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13> 23, 102, 128 (3 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4) <0804H> 25, 37, 88, 90, 91 (5 counts)

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <8104A> 38, 78, 113, 135, 170 (5 counts)

POSSESSION OF A CONTROLLED SUBSTANCE, 18-18-403.5(1),(2)(a) C.R.S. (DF4) <8101B> 39, 52, 57, 71, 79, 114, 116, 117, 126, 136, 143, 171, 172 (13 counts)

CRIMINAL IMPERSONATION, 18-5-113(1)(b)(II) C.R.S. (F6) <1011F> 42 (1 count)

IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H> 48, 49, 50, 59, 80, 81, 83, 112, 119, 121, 141, 145, 146, 147, 148 (15 counts)

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(c)(II) C.R.S. (DF3) <81049> 51 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a) C.R.S. (F5) <0804D> 55, 56, 94 (3 counts)

SPECIAL OFFENDER, 18-18-407(1)(d)(II) C.R.S. (DF1) <33A46> 58, 72, 118 (3 counts)

CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(b) C.R.S. (F6) <13082> 60 (1 count)

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040> 61, 73, 77, 103, 109, 125, 144 (7 counts)

SECOND DEGREE BURGLARY, 18-4-203(1),(2)(a) C.R.S. (F3) <06032> 63, 133 (2 counts)

THEFT, 18-4-401(1),(2)(g) C.R.S. (F5) <08A14> 64, 134 (2 counts)

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, 18-12-108(1) C.R.S. (F6) <3007A> 65, 70, 75, 76, 86 (5 counts)

VEHICULAR ELUDING, 18-9-116.5 C.R.S. (F5) <27162> 67, 89 (2 counts)

CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5) <13083> 74, 82, 111, 122, 142, 149 (6 counts)

POSSESSION OF A FORGERY DEVICE, 18-5-706 C.R.S. (F6) <13052> 84 (1 count)

POSSESSION OF BLANK FINANCIAL TRANSACTION DEVICES, 18-5-705(1),(3) C.R.S. (F5) <13044> 85 (1 count)

THEFT, 18-4-401(1),(2)(i) C.R.S. (F3) <08A16> 87 (1 count)

IMPERSONATING A PEACE OFFICER, 18-8-112 C.R.S. (F6) <22113> 93 (1 count)

ASSAULT IN THE THIRD DEGREE, 18-3-204(1)(a);18-1.3-501(1.5) C.R.S. (M1) <0203A> 95 (1 count)


POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE - SCHEDULE I OR II, 18-18-405(1),(2)(c)(I) C.R.S. (DF3) <81046> 115 (1 count)

CRIMINAL ATTEMPT TO COMMIT AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a);18-2-101 C.R.S. (F6) <0804DA> 124 (1 count)

POSSESSION OF A CONTROLLED SUBSTANCE - SCHEDULE III, IV, OR V, 18-18-403.5(1),(2)(c) C.R.S. (DM1) <83016> 173 (1 count)

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

Dated this 9 day of October, 2019.



Martin F. Egelhoff
Presiding Judge
Denver District Court

COUNT ONE

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

Between and including February 5, 2017 and October 9, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES, BRITTANY GIARDINO, WILLIAM JOKAY-SZILAGJI, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, and JAMES SCOTT**, 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: **THOMAS BRIDGES, BRITTANY GIARDINO, WILLIAM JOKAY-SZILAGJI, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT, KAREN ANDRES, ESTEVAN BARRIENTOS, ALBERTO BENIPAYO, WILLIAM CARSON, ALEXANDER COLE, ESSENCE FORSEY, MICHELE LILLA, KORY LOVE, JULIE MARTINEZ, NICOLE PEDROZA, ANTON PLEASANT, FREDERICK RICCIARDELLI, GERARDO SANCHEZ, ROBERT STANLEY, LEE SWINK, KEVIN WILLENBRECHT, JENNIFER WILLIAMSEN** and other persons known or 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 **THOMAS BRIDGES**, the acts described in counts 2, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, and 169, including any lesser included offenses of these counts.

As to **BRITTANY GIARDINO**, the acts described in counts 2, 37, 53, 54, 55, 56, 152, 153, 154, 155, 157, 158 and Predicate Act 175, including any lesser included offenses of these counts.

As to **WILLIAM JOKAY-SZILAGJI**, the acts described in counts 2, 26, 71, 72, 73, 74, 83, 84, and 85, including any lesser included offenses of these counts.

As to **DONALD MCGRATH**, the acts described in counts 2, 8, 9, 10, 11, 36, 37, 53, 54, 55, 56, 62, 63, 64, 66, 77, 78, 79, 80, 81, 82, 123, 124, 125, and 126, including any lesser included offenses of these counts.

As to SARAH MCGRATH, the acts described in counts 2, 36, 40, 41, 42, 43, 44, 45, 46, 53, 54, 55, 56, 57, 58, 59, 60, 61, 77, 78, 79, 80, 81, 82, including any lesser included offenses of these counts.

As to JEREMY RODGERS, the acts described in counts 2, 26, 36, 47, 48, 49, 50, 53, 54, 55, 56, 63, 64, 127, 128, 129, 130, 131, 132, 133, 134, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, and 149, including any lesser included offenses of these counts.

As to JAMES SCOTT, the acts described in counts 2, 3, 4, 5, 6, 7, 15, 53, 54, 55, 56, 63, 64, 69, and Predicate Act 174, including any lesser included offenses of these counts.

PREDICATE ACT COUNT ONE HUNDRED SEVENTY-FOUR
SECOND DEGREE BURGLARY, 18-4-203(1) C.R.S. (F4) <06031>

On or about February 12, 2017, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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 [REDACTED] APARTMENTS, located at [REDACTED] E. DONALD AVENUE, DENVER, COLORADO with the intent to commit therein the crime of THEFT; in violation of section 18-4-203(1), C.R.S.

PREDICATE ACT COUNT ONE HUNDRED SEVENTY-FIVE
AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b) C.R.S. (F6) <0804E>

On or about August 23, 2018, at and triable in the City and County of Denver, State of Colorado, BRITTANY GIARDINO unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-409(4)(b), C.R.S.

COUNT TWO

CONSPIRACY TO COMMIT AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(b); 18-2-201 C.R.S. (F4) <0804JC>

Between and including January 2, 2018 and October 9, 2019 at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES, BRITTANY GIARDINO, WILLIAM JOKAY-SZILAGJI, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT, ESSENCE FORSEY, MICHELE LILLA, ANTON PLEASANT, FREDERICK RICCIARDELLI, GERARDO SANCHEZ, and KEVIN WILLENBRECHT**, with the intent to promote or facilitate the commission of the crime of **AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE**, unlawfully and feloniously agreed with **EACH OTHER** and a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-409(2),(3)(b) and 18-2-201, C.R.S.

The facts supporting Count 1, Count 2, and Predicate Acts 174 and 175 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. From at least February 5, 2017, through October 9, 2019, with various members joining at various times, Thomas Bridges, Brittany Giardino, William Jokay-Szilagji, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and other persons known or unknown, including, but not limited to, Karen Andres, Estevan Barrientos, Alberto Benipayo, William Carson, Alexander Cole, Essence Forsey, Michele Lilla, Kory Love, Julie Martinez, Nicole Pedroza, Anton Pleasant, Frederick Ricciardelli, Gerardo Sanchez, Robert Stanley, Lee Swink, Kevin Willenbrecht, and Jennifer Williamsen, 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, weapons, motor vehicles, identification documents, financial transaction devices, and other property. Members of the enterprise obtained stolen property primarily through mail thefts, burglaries, and the stealing of motor vehicles in Colorado.
3. Members of the enterprise, including, but not limited to, Thomas Bridges, Essence Forsey, Brittany Giardino, William Jokay-Szilagji, Michele Lilla, Donald McGrath, Sarah McGrath, Anton Pleasant, Frederick Ricciardelli, Jeremy Rodgers, Gerardo Sanchez, James Scott, Kevin Willenbrecht, working in concert with each other and/or with persons known and unknown to the Grand Jury, stole at least twenty-eight motor vehicles in the Denver metropolitan area.
4. Since at least January 2, 2018, one or more enterprise members would conspire to steal motor vehicles that would then be used to commit other crimes including burglaries and mail theft.

5. Enterprise members traded or sold stolen property and/or used fraudulently obtained money to obtain controlled substances, including, but not limited to, methamphetamine and heroin.

6. At all times relevant to this Indictment, members of the enterprise shared money, stolen property, stolen automobiles, stolen identification and financial devices, transportation, food, clothing, and living quarters to accomplish the enterprises' goals. Members of the enterprise, including but not limited to, Thomas Bridges, Brittany Giardino, William Jokay-Szilagji, Donald McGrath, Sarah McGrath, and Jeremy Rodgers, lived together during various times between the dates of February 5, 2017, through October 9, 2019.

7. Members of the enterprise commonly possessed stolen or misplaced identification documents, financial devices, and personal identifying information of others. Members also commonly possessed counterfeit US currency. Members of the enterprise fraudulently used these identification documents, financial devices, personal identifying information, and counterfeit currency to obtain cash, credit, property, services, and other things of value.

8. At all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$42,000 worth of property while committing burglaries, theft, and fraud.

9. At all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$415,000.00 worth of motor vehicles.

10. As to Predicate Act 174, on April 13, 2017, James Scott pled guilty to one count of Second Degree Burglary - Building, in violation of section C.R.S. 18-4-203(1), C.R.S., in Denver District Court Case Number 17CR1177. James Scott was sentenced in that case on October 12, 2018.

11. As to Predicate Act 175, on September 6, 2018, Brittany Giardino pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree, in violation of section C.R.S. 18-4-409(4)(b), C.R.S., in Douglas District Court Case Number 18CR852. Brittany Giardino was sentenced in that case on September 6, 2018 and May 20, 2019.

COUNT THREE

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

On or about February 5, 2017, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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 [REDACTED] located at [REDACTED] E. ASBURY CIRCLE, DENVER, COLORADO with the intent to commit therein the crime of THEFT; in violation of section 18-4-203(1), C.R.S.

COUNT FOUR

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

On or about February 5, 2017, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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: [REDACTED] 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.

The facts supporting Counts 3 and 4 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 5, 2017, James Scott, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] located at [REDACTED] East Asbury Circle in the City of Denver, State of Colorado.
3. James Scott entered a storage room and broke into approximately seven storage units. James Scott, in association with the enterprise, stole a [REDACTED] women's mountain bike, valued at \$1,000, from a storage unit belonging to [REDACTED].
4. James Scott was identified through surveillance video and DNA evidence. The DNA identification was discovered on or about March 19, 2019.

COUNT FIVE

SECOND DEGREE BURGLARY, 18-4-203(1) C.R.S. (P4) <06031>

On or about February 26, 2017, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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 [REDACTED] located at [REDACTED] UNIVERSITY BOULEVARD, DENVER, COLORADO with the intent to commit therein the crime of THEFT; in violation of section 18-4-203(1), C.R.S.

The facts supporting Count 5 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 26, 2017, James Scott, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] located at [REDACTED] South University Boulevard in the City of Denver, State of Colorado.
3. James Scott went to the basement storage area and pried open the doors of several storage units. James Scott stole a battery operated area light, valued at \$5.00, from a storage unit belonging to [REDACTED]
4. James Scott was identified through DNA evidence.

COUNT SIX

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

Between and including January 2, 2018 and January 10, 2018, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED], 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 SEVEN

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

On or about January 2, 2018, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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: **FLOORMATS, SUNGLASSES, JACKET, LAWN CHAIRS, DOCUMENTS, and OTHER PERSONAL PROPERTY** 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.

The facts supporting Counts 6 and 7 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of January 2, 2018 and January 10 2018, James Scott and an as-yet unidentified enterprise member, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] valued at \$3,475. The vehicle was taken without authorization from a parking garage located at [REDACTED] South University Boulevard in the City of Denver, State of Colorado.
3. Surveillance video revealed James Scott and an as-yet unidentified enterprise member walking through a condominium complex to the parking garage where they entered Mr. [REDACTED] sedan and left the area.
4. James Scott and an as-yet unidentified enterprise member, in association with the enterprise, stole floor mats, sunglasses, a jacket, phone charger, ear buds, lawn chairs, documents, keys, change, and thumb drives from the 2009 Audi A4 sedan owned by [REDACTED]. The total value of the property was approximately \$1,000.
5. Mr. [REDACTED] stolen [REDACTED] sedan was recovered by police on January 10, 2018, in the parking lot of 1945 South Cherry Street, located in the City of Denver, State of Colorado.

6. James Scott was identified through surveillance video and DNA evidence. The DNA identification was discovered on or about December 11, 2018.

COUNT EIGHT

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 June 22, 2018, at and 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, DONALD MCGRATH 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 NINE

ASSAULT IN THE SECOND DEGREE, 18-3-203(1)(b) C.R.S. (F4) <0202L>

On or about June 22, 2018, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH, with intent to cause bodily injury to another, unlawfully and feloniously caused bodily injury to [REDACTED] by means of a deadly weapon, namely: HANDGUN; in violation of section 18-3-203(1)(b), C.R.S.

COUNT TEN

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 June 22, 2018, at and 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, DONALD MCGRATH 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 ELEVEN

ASSAULT IN THE SECOND DEGREE, 18-3-203(1)(b) C.R.S. (F4) <0202L>

On or about June 22, 2018, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH, with intent to cause bodily injury to another, unlawfully and feloniously caused bodily injury to [REDACTED] by means of a deadly weapon, namely: HANDGUN; in violation of section 18-3-203(1)(b), C.R.S.

The facts supporting Counts 8 through 11 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 22, 2018, Donald McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly engaged in conduct constituting a substantial step toward the commission of murder in the first degree, and with intent to cause the death of a person other than themselves, attempted to cause the deaths of [REDACTED] and [REDACTED]

3. On or about June 22, 2018, Donald McGrath, [REDACTED], [REDACTED], and [REDACTED] were attending a party at [REDACTED] East Evans Avenue, Apartment [REDACTED], in the County of Arapahoe, State of Colorado. Donald McGrath left the apartment and returned a short time later. When he returned, Donald McGrath began to argue with [REDACTED]. Donald McGrath produced a handgun and a struggle with [REDACTED] ensued. Donald McGrath fired the handgun at least one time striking [REDACTED]'s left shoulder area.

4. The bullet fired by Donald McGrath travelled through [REDACTED] and then struck [REDACTED] in the neck.

5. Donald McGrath and [REDACTED] transported [REDACTED] to a hospital. Rescue units responded to the scene of the shooting and transported [REDACTED] to a hospital. [REDACTED] and [REDACTED] both recovered from their injuries.

6. During an interview with Sheriff's Investigators, [REDACTED] identified the shooter as "Donnie McGrath." [REDACTED] identified a photograph of Donald McGrath.

COUNT TWELVE

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

On or about August 5, 2018, at and triable in the City and County of Denver, State of Colorado, MICHELE LILLA unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED] without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of **FIRST DEGREE CRIMINAL TRESPASS – AUTOMOBILE** as set forth in section 18-4-502, 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 THIRTEEN

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

On or about August 5, 2018, at and triable in the City and County of Denver, State of Colorado, MICHELE LILLA 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 FOURTEEN

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

On or about August 5, 2018, at and triable in the City and County of Denver, State of Colorado, MICHELE LILLA 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: **AUDIO SUBWOOFERS** 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.

The facts supporting Counts 12 through 14 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 5, 2018, Michele Lilla, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] valued at \$10,200. The vehicle was taken without authorization from [REDACTED] South Acoma Street in the City of Englewood, State of Colorado.
3. On or about August 5, 2018, Michele Lilla and an as-yet unidentified enterprise member, in association with the enterprise, unlawfully, feloniously, and knowingly entered [REDACTED]
4. Once entry into [REDACTED] vehicle was gained, Michele Lilla and an as-yet unidentified enterprise member, in association with the enterprise, stole audio subwoofers, valued at \$1,400.

5. Michele Lilla and an as-yet unidentified enterprise member fled the vehicle trespass in the stolen [REDACTED]
6. Shortly after the vehicle trespass, Denver Police located the abandoned [REDACTED] at 3359 South Galena Street in the City of Denver, State of Colorado.
7. Michele Lilla was identified through fingerprint evidence and Walmart surveillance video associated with a receipt that was recovered from stolen [REDACTED]

COUNT FIFTEEN

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

On or about August 29, 2018, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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 [REDACTED] located at [REDACTED] E. GIRARD AVENUE, DENVER COLORADO with the intent to commit therein the crime of THEFT; in violation of section 18-4-203(1), C.R.S.

The facts supporting Count 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, James Scott, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] located at [REDACTED] East Girard Avenue in the City of Denver, State of Colorado.
3. James Scott entered an office and stole a set of keys and a resident package. The package was emptied in a bathroom and the contents were left behind.
4. James Scott was identified through surveillance video.

COUNT SIXTEEN

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

Between and including September 22, 2018 and November 14, 2018, at and triable in the City and County of Denver, State of Colorado, MICHELE LILLA unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED], 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 Count 16 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of September 22, 2018 and November 14, 2018, Michele Lilla, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] truck, valued at \$3,450. The vehicle was taken without authorization from [REDACTED] East 18th Avenue in the City of Denver, State of Colorado.
3. Mr. [REDACTED]'s stolen [REDACTED] truck was recovered by police on November 14, 2018, at 5560 South Elati Street in the City of Littleton, State of Colorado.
4. Michele Lilla was identified through fingerprint evidence.

COUNT SEVENTEEN

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 October 8, 2018, at and triable in the City and County of Denver, State of Colorado, JULIE MARTINEZ, a customer of FAST CASH PAWN, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding her ownership and length of ownership for a purchase transaction or contract for purchase of tangible personal property, namely: GOLF CLUBS and BAG; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT EIGHTEEN

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 October 10, 2018, at and triable in the City and County of Denver, State of Colorado, ALEXANDER COLE, a customer of FAST CASH PAWN, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his ownership for a purchase transaction or contract for purchase of tangible personal property, namely: [REDACTED] SNOWBOARD; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

The facts supporting Count 17 and 18 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about October 8, 2018, Julie Martinez, in association with the enterprise, entered the Fast Cash Pawn located at 7595 East Iliff Avenue in the City of Denver, State of Colorado. Julie Martinez unlawfully, feloniously and knowingly gave false information regarding her ownership of a set of golf clubs when she sold the golf clubs to a pawnbroker.**
- 3. The golf clubs and bag had been stolen during a garage burglary that occurred on or about October 5, 2018 at 8220 East Phillips Place in the City of Centennial, State of Colorado.**
- 4. On or about October 10, 2018, Alexander Cole, in association with the enterprise, entered the Fast Cash Pawn located at 7595 East Iliff Avenue in the City of Denver, State of Colorado. Alexander Cole unlawfully, feloniously and knowingly gave false information regarding his ownership of a snowboard when he sold the snowboard to a pawnbroker.**
- 5. The [REDACTED] snowboard had been stolen during a garage burglary that occurred on or about October 5, 2018 at [REDACTED] East Phillips Place in the City of Centennial, State of Colorado.**

COUNT NINETEEN

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

Between and including October 18, 2018 and October 21, 2018, at and triable in the City and County of Denver, State of Colorado, **FREDERICK RICCIARDELLI** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 Count 19 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of October 18, 2018 and October 21, 2018, Frederick Ricciardelli, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] s [REDACTED] truck, valued at \$5,200. The vehicle was taken without authorization from [REDACTED] 116th Place in the City of Westminster, State of Colorado.
3. On October 20, 2018, a Denver Police Detective, while acting in an undercover capacity, negotiated to purchase the stolen [REDACTED] truck from Frederick Ricciardelli.
4. On October 21, 2018, the stolen [REDACTED] truck was delivered to the Denver Police Detective. Frederick Ricciardelli's Colorado identification card was located in the vehicle. Ricciardelli was also identified through fingerprint evidence.

COUNT TWENTY

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

On or about October 21, 2018, at and triable in the City and County of Denver, State of Colorado, ALEXANDER COLE 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-ONE

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

On or about October 21, 2018, at and triable in the City and County of Denver, State of Colorado, ALEXANDER COLE with the intent to defraud [REDACTED] 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; in violation of section 18-5-102(1)(c), 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 October 21, 2018, Alexander Cole, in association with the enterprise, unlawfully, feloniously, and knowingly cashed a stolen or misplaced check belonging to [REDACTED] without permission. The \$90.00 check from the account of [REDACTED] was cashed at the Walmart located at 9400 East Hampden Avenue in the City of Denver, State of Colorado.
3. Alexander Cole, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely made the check out to himself and uttered the check to Walmart employees.
4. Alexander Cole was identified through video surveillance.

COUNT TWENTY-TWO

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b) C.R.S. (F6) <0804E>

On or about October 26, 2018, at and triable in the City and County of Denver, State of Colorado, **FREDERICK RICCIARDELLI** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED] without authorization or by threat or deception, and the value of the motor vehicle was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-409(4)(b), C.R.S.

COUNT TWENTY-THREE

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

On or about October 26, 2018, at and triable in the City and County of Denver, State of Colorado, **FREDERICK RICCIARDELLI** 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: **20 FOOT COVERED CARGO TRAILER WITH TRUCK SEATS and STOVE PARTS** of [REDACTED] with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT TWENTY-FOUR

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

On or about October 26, 2018, at and triable in the City and County of Denver, State of Colorado, **FREDERICK RICCIARDELLI** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED] without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of **VEHICULAR ELUDING** as set forth in section 18-9-116.5, 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.

The facts supporting Counts 22 through 24 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about October 26, 2018, Frederick Ricciardelli, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] truck, valued at \$2,575. The vehicle was taken without authorization from [REDACTED] South Willow Street in the City of Centennial, State of Colorado.
3. Frederick Ricciardelli, in association with the enterprise, also stole a 20 foot covered cargo trailer with truck seats and stove parts, belonging to [REDACTED] and valued at \$4,500,

that was attached to the [REDACTED] truck. The trailer was recovered by police on October 29, 2018 near 694 South Flamingo Court in the City of Denver, State of Colorado.

4. On or about October 26, 2018, Frederick Ricciardelli, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] truck, valued at \$2,075. The vehicle was taken without authorization from [REDACTED] East Mexico Avenue in the City of Denver, State of Colorado.

5. On October 26, 2018, police observed the stolen [REDACTED] and the stolen [REDACTED] truck in an apartment complex parking lot at 6900 East Evans Avenue in the City of Denver, State of Colorado. Frederick Ricciardelli was observed driving both vehicles and moving items between the vehicles.

6. Police followed Ricciardelli when he and three as-yet unidentified enterprise members left the parking lot in the stolen [REDACTED] truck. Aurora Police Officers attempted to stop Ricciardelli at 14090 East Evans Avenue in the City of Aurora, State of Colorado. Ricciardelli eluded officers by driving on sidewalks, running stoplights, and cutting off vehicles, all at a very high rate of speed.

7. Mr. [REDACTED]'s stolen [REDACTED] truck and Mr. [REDACTED]'s stolen [REDACTED] truck were recovered by police on October 26, 2018, at 6880 East Evans Avenue in the City of Denver, State of Colorado.

COUNT TWENTY-FIVE

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

Between and including November 6, 2018 and November 12, 2018, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 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 25 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of November 6, 2018 and November 12, 2018, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] truck, valued at \$20,775. The vehicle was taken without authorization while it was running in the driveway of [REDACTED] South Birch Street in the City of Denver, State of Colorado.
3. On November 12, 2018, police contacted Gerardo Sanchez while he was in physical control of Mr. [REDACTED]'s stolen [REDACTED]. The vehicle was recovered from the area of West Warren Avenue and South Xavier Street in the City of Denver, State of Colorado.

COUNT TWENTY-SIX

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

Between and including November 17, 2018 and February 14, 2019, at and triable in the City and County of Denver, State of Colorado, **WILLIAM JOKAY-SZILAGJI and JEREMY RODGERS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 Count 26 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of November 17, 2018 and February 14, 2019, William Jokay-Szilagji and Jeremy Rodgers, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] valued at \$4,325. The vehicle was taken without authorization from 1294 Scranton Street in the City of Aurora, State of Colorado.
3. Ms. [REDACTED] was recovered by police on February 14, 2019, at 14772 East Radcliff Place in the City of Aurora, State of Colorado.
4. William Jokay-Szilagji was found to be in possession of the vehicle keys when the [REDACTED] was recovered. Additionally, William Jokay-Szilagji's fingerprints were found in the vehicle. Jeremy Rodgers was identified through video surveillance from February 11, 2019.

COUNT TWENTY-SEVEN

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, **NICOLE PEDROZA** 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-EIGHT

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, **NICOLE PEDROZA** 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-NINE

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, **KORY LOVE** 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 THIRTY

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, **NICOLE PEDROZA** 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 THIRTY-ONE

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, KORY LOVE 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 THIRTY-TWO

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, KORY LOVE 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 THIRTY-THREE

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, KORY LOVE and NICOLE PEDROZA 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 THIRTY-FOUR

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, KORY LOVE and NICOLE PEDROZA 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 THIRTY-FIVE

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

On or about November 18, 2018, at and triable in the City and County of Denver, State of Colorado, KORY LOVE 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.

The facts supporting Counts 27 through 35 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 18, 2018, Kory Love and Nicole Pedroza, in association with the enterprise, unlawfully, feloniously, and knowingly used stolen or misplaced credit cards belonging to [REDACTED] without permission. Kory Love and Nicole Pedroza used the credit cards to make fraudulent purchases at retail locations in the City of Glendale, State of Colorado.
3. Nicole Pedroza utilized [REDACTED]'s stolen credit card to make two separate purchases from the Home Depot located at 860 South Colorado Boulevard in the City of Glendale, State of Colorado.
4. Kory Love utilized [REDACTED]'s stolen credit to make one purchase from the Home Depot located at 860 South Colorado Boulevard in the City of Glendale, State of Colorado.
5. Nicole Pedroza utilized [REDACTED]'s stolen credit card to make one purchase from the King Soopers located at 4600 Leetsdale Drive in the City of Glendale, State of Colorado.
6. Kory Love utilized [REDACTED]'s stolen credit card to make two separate purchases from the King Soopers located at 4600 Leetsdale Drive in the City of Glendale, State of Colorado.
7. Kory Love and Nicole Pedroza utilized [REDACTED]'s stolen credit card to make one purchase from the Target Store located at 4301 East Virginia Avenue in the City of Glendale, State of Colorado. Kory Love and Nicole Pedroza attempted a second transaction with [REDACTED]'s stolen credit card that was declined.
8. Kory Love attempted to utilize [REDACTED]'s stolen credit card to make one purchase from the Target Store located at 4301 East Virginia Avenue in the City of Glendale, State of Colorado. The transaction was declined.
9. Kory Love and Nicole Pedroza were identified through video surveillance.

COUNT THIRTY-SIX

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

On or about December 9, 2018, at and triable in the City and County of Denver, State of Colorado, **DONALD MCGRATH, SARAH MCGRATH, and JEREMY RODGERS** 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 **LUCKY'S AUTO and ESSA 2008 LLC**, located at **1202 E 58TH AVENUE, UNIT B, DENVER, COLORADO** with the intent to commit therein the crime of **THEFT**; in violation of section 18-4-203(1), C.R.S.

The facts supporting Count 36 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 9, 2018, Donald McGrath, Sarah McGrath, and Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly broke into ESSA 2008 LLC and Lucky's Auto located at 1202 East 58th Avenue, Unit B, in the County of Adams, State of Colorado.
3. Donald McGrath, Sarah McGrath and Jeremy Rodgers entered ESSA 2008 LLC and then forced entry into the adjacent business, Lucky's Auto, by prying open a connecting door. Donald McGrath, Sarah McGrath and Jeremy Rodgers stole blank check stock, valued at \$1, from ESSA 2008 LLC. Donald McGrath, Sarah McGrath, and Jeremy Rodgers stole vehicle keys, a saw, documents, and a computer, valued at \$501, from Lucky's Auto.
4. On or about January 11, 2019, Jeremy Rodgers was found to be in possession of vehicle keys stolen from Lucky's Auto. On or about February 14, 2019, Donald and Sarah McGrath were found to be in possession of blank check stock stolen from ESSA 2008 LLC and documents stolen from Lucky's Auto.

COUNT THIRTY-SEVEN

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

Between and including December 13, 2018 and January 7, 2019, at and triable in the City and County of Denver, State of Colorado, BRITTANY GIARDINO and DONALD MCGRATH unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED], 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 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 37 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. Between and including the dates of December 13, 2018 and January 7, 2019, Brittany Giardino and Donald McGrath, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] valued at \$26,150. The vehicle was taken without authorization from [REDACTED] Quivira Drive in the County of Adams, State of Colorado.**
- 3. Ms. [REDACTED]'s [REDACTED] was recovered by police on January 7, 2019, at 14772 East Radcliff Place in the City of Aurora, State of Colorado.**
- 4. Donald McGrath and Brittany Giardino were identified through highway video surveillance.**

COUNT THIRTY-EIGHT

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <§104A>

On or about December 13, 2018, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute METHAMPHETAMINE, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT THIRTY-NINE

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

On or about December 13, 2018, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN 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 4 grams, per 18-1.3-103.5(3)(a).

The facts supporting Counts 38 and 39 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 13, 2018, Jennifer Williamsen, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute methamphetamine, a schedule II controlled substance, during a police contact at East Evans Avenue and South Bellaire Street in the City of Denver, State of Colorado. The net weight of the methamphetamine was 8.195 grams and .040 grams.
3. Jennifer Williamsen was in possession of several new and used zip-close plastic bags and an electronic scale.

COUNT FORTY

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

On or about December 21, 2018, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH 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 FORTY-ONE

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

On or about December 21, 2018, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH with the intent to defraud [REDACTED], 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: ACCOUNT SIGNATURE CARDS; in violation of section 18-5-102(1)(c), C.R.S.

COUNT FORTY-TWO

CRIMINAL IMPERSONATION, 18-5-113(1)(b)(II) C.R.S. (F6) <1011F>

On or about December 21, 2018, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: [REDACTED], and in such identity or capacity performed an act with intent to unlawfully gain a benefit for herself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT FORTY-THREE

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

On or about January 2, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH with the intent to defraud ESSA 2008 LLC, 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]; in violation of section 18-5-102(1)(c), C.R.S.

COUNT FORTY-FOUR

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

On or about January 2, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH with the intent to defraud ESSA 2008 LLC, 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]; in violation of section 18-5-102(1)(c), C.R.S.

COUNT FORTY-FIVE

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

On or about January 2, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH 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.

The facts supporting Counts 40 through 45 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 21, 2018, Sarah McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly used a stolen driver license and the personal identifying information belonging to [REDACTED] without permission. Sarah McGrath used the driver license and personal identifying information to open fraudulent bank accounts at the Academy Bank branch located at 601 Englewood Parkway in the City of Englewood, State of Colorado.
3. On or about December 21, 2018, Sarah McGrath, in association with the enterprise, defrauded [REDACTED] when she completed and signed checking account and savings account signature cards using [REDACTED]'s personal identifying information.
4. On or about December 21, 2018, Sarah McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly assumed [REDACTED]'s identity to open the bank accounts.
5. On or about January 2, 2019, Sarah McGrath, in association with the enterprise, defrauded ESSA 2008 LLC when she completed, and deposited check number [REDACTED] and check number [REDACTED] drawn on the bank account of ESSA 2008 LLC.
6. On or about January 2, 2019, Sarah McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information of [REDACTED]

[REDACTED] without permission. Sarah McGrath used the information in an attempt to send herself an electronic PayPal payment.

7. On or about January 16, 2019, Sarah McGrath was found to be in possession of [REDACTED]'s Colorado driver license. On or about February 14, 2019, Sarah McGrath was found to be in possession of ESSA 2008 LLC's blank check stock.

COUNT FORTY-SIX

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

Between and including January 5, 2019 and January 9, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 Count 46 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of January 5, 2019 and January 9, 2019, Sarah McGrath, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] valued at \$2,900. The vehicle was taken without authorization from [REDACTED] Dover Way in the City of Broomfield, State of Colorado.
3. Mr. [REDACTED] was recovered by police on January 9, 2019, at 14032 East Iowa Drive in the City of Aurora, State of Colorado.
4. Sarah McGrath was identified through fingerprint evidence.

COUNT FORTY-SEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b) C.R.S. (F6) <0804E>

On or about January 9, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-409(4)(b), C.R.S.

COUNT FORTY-EIGHT

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

On or about January 11, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 January 11, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 January 11, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 Counts 47 through 50 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 9, 2019, Jeremy Rodgers, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] valued at \$3,900. The vehicle was taken without authorization from [REDACTED] East Quincy Avenue in the City of Denver, State of Colorado.
3. Ma. [REDACTED] was recovered by police on January 11, 2019, at [REDACTED] South Quebec Street in the City of Greenwood Village, State of Colorado. Stolen and/or misplaced credit cards were located in the vehicle.
4. On or about January 11, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen or misplaced credit card belonging to [REDACTED] without permission.
5. On or about January 11, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen or misplaced credit card belonging to [REDACTED] without permission.
6. On or about January 11, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed two stolen credit cards belonging to [REDACTED] without permission.
7. Jeremy Rodgers was identified through cell phone evidence, stolen property, and interviews.

COUNT FIFTY-ONE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(e)(II) C.R.S. (DF3) <§1049>

On or about January 9, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute METHAMPHETAMINE, a controlled substance; in violation of section 18-18-405(1),(2)(e)(II), C.R.S.

COUNT FIFTY TWO

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

On or about January 9, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN 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 51 and 52 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 9, 2019, Jennifer Williamsen, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute methamphetamine, a schedule II controlled substance, during a police contact at 5124 East Warren Avenue in the City of Denver, State of Colorado. The net weight of the methamphetamine was 3.469 grams.
3. Jennifer Williamsen was in possession of multiple zip-close plastic bags containing methamphetamine and other new, unused zip-close plastic bags.

COUNT FIFTY-THREE

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

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **BRITTANY GIARDINO, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT and KEVIN WILLENBRECHT** 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 **AUTO DRIVEAWAY**, located at **5777 E. EVANS AVENUE UNIT 109, DENVER, COLORADO** with the intent to commit therein the crime of **AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE** and **THEFT**; in violation of section 18-4-203(1), C.R.S.

COUNT FIFTY-FOUR

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

Between and including January 16, 2016 and January 18, 2016, at and triable in the City and County of Denver, State of Colorado, **BRITTANY GIARDINO, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT and KEVIN WILLENBRECHT** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of **AUTODRIVEAWAY** 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 FIFTY-FIVE

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a) C.R.S. (F5) <0804D>

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **BRITTANY GIARDINO, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT and KEVIN WILLENBRECHT** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of **GELCO FLEET TRUST** without authorization or by threat or deception, and the value of the motor vehicle was twenty thousand dollars or more; in violation of section 18-4-409(4)(a), C.R.S.

COUNT FIFTY-SIX

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a) C.R.S. (F5) <0804D>

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **BRITTANY GIARDINO, DONALD MCGRATH, SARAH MCGRATH, JEREMY RODGERS, JAMES SCOTT and KEVIN WILLENBRECHT** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of **WHEELS LT**, without authorization or by threat or deception, and the value of the motor vehicle was twenty thousand dollars or more; in violation of section 18-4-409(4)(a), C.R.S.

COUNT FIFTY-SEVEN

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

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **SARAH MCGRATH** 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 18-1.3-103.5(3)(a).

COUNT FIFTY-EIGHT

SPECIAL OFFENDER, 18-18-407(1)(d)(II) C.R.S. (DF1) <33A46>

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **SARAH MCGRATH** committed the felony offense charged in count 57 and the defendant or a confederate of the defendant possessed a firearm in a vehicle the defendant was occupying during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

COUNT FIFTY-NINE

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

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, **SARAH MCGRATH** 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

**CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(b) C.R.S. (F6)
<13082>**

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH unlawfully and feloniously possessed or controlled two or more financial devices, which defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holder; in violation of section 18-5-903(1),(2)(b), C.R.S.

COUNT SIXTY-ONE

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about January 16, 2019, at and triable in the City and County of Denver, State of Colorado, SARAH MCGRATH unlawfully and feloniously possessed a forged instrument, namely: US CURRENCY, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

The facts supporting Counts 53 through 61 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 16, 2019, Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht, in association with the enterprise, unlawfully feloniously, and knowingly broke into Auto Driveaway located at 5777 East Evans Avenue, Unit 109, in the City of Denver, State of Colorado.
3. Upon entry, Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht, in association with the enterprise, stole a printer blank business check stock, license plates, fleet credit cards, and vehicle keys, valued at \$101, from Auto Driveaway. Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht used the vehicle keys to steal three vehicles from the location.
4. Between and including the dates of January 16, 2019 and January 18, 2019, Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht, in association with the enterprise, stole Auto Driveaway's [REDACTED] valued at \$6,650.
5. Auto Driveaway's [REDACTED] was recovered by police on January 18, 2019, at Spring Creek Road and Piney Lake Road in the County of Douglas, State of Colorado. Jeremy Rodgers' fingerprint was located in the vehicle.
6. On or about January 16, 2019, Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht, in association with the enterprise, stole Gelco Fleet Trust's [REDACTED] valued at \$35,495. Police

recovered the vehicle on January 16, 2019, at 6950 East Chenango Avenue in the City of Denver, State of Colorado.

7. On or about January 16, 2019, Brittany Giardino, Donald McGrath, Sarah McGrath, Jeremy Rodgers, James Scott, and Kevin Willenbrecht, in association with the enterprise, stole Wheels Lt's [REDACTED] valued at \$22,125.

8. On January 16, 2019, police contacted Sarah McGrath while she was in physical control of the stolen [REDACTED] at 5100 East Warren Avenue in the City of Denver, State of Colorado.

9. On or about January 16, 2019, Sarah McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly possessed methamphetamine, a schedule II controlled substance. The net weight of the methamphetamine was 2.876 grams.

10. While in possession of the methamphetamine, Sarah McGrath was in possession of a Glock 25, 9mm handgun. The handgun was located between the driver's seat and the center console of the 2017 Ford Explorer.

11. On or about January 16, 2019, Sarah McGrath, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen driver license belonging to [REDACTED] without permission.

12. On or about January 16, 2019, Sarah McGrath, in association with the enterprise, unlawfully and feloniously possessed nine stolen Shell gas station fleet credit cards and stolen business check stock belonging to Auto Driveway.

13. On or about January 16, 2019, Sarah McGrath, in association with the enterprise, unlawfully and feloniously possessed one counterfeit \$20 bill.

COUNT SIXTY-TWO

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

Between and including January 19, 2019 and January 22, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 Count 62 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. Between and including the dates of January 19, 2019 and January 22, 2019, Donald McGrath, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] valued at \$12,650. The vehicle was taken without authorization from [REDACTED] North Josephine Street in the City of Denver, State of Colorado.**
- 3. Mr. [REDACTED]'s stolen [REDACTED] was recovered by police on January 22, 2019, at 9067 Westview Road in the City of Lone Tree, State of Colorado.**
- 4. Donald McGrath was identified through fingerprint evidence.**

COUNT SIXTY-THREE

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

On or about January 21, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH, JEREMY RODGERS, and JAMES SCOTT 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] S. DAWSON WAY, AURORA, 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 SIXTY-FOUR

THEFT, 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

On or about January 21, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH, JEREMY RODGERS, and JAMES SCOTT 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: FIREARMS, ELECTRONICS, and JEWELRY of [REDACTED] and [REDACTED] with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive [REDACTED] and [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT SIXTY-FIVE

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

On or about January 25, 2019, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: [REDACTED] REVOLVER, and JAMES SCOTT was previously convicted of a felony, namely: SECOND DEGREE BURGLARY - BUILDING, as defined by C.R.S. 18-4-203(1), on OCTOBER 12, 2018 in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 63 through 65 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 21, 2019, Donald McGrath, Jeremy Rodgers, and James Scott, in association with the enterprise, unlawfully feloniously, and knowingly broke into the dwelling of [REDACTED] and [REDACTED] located at [REDACTED] South Dawson Way in the City of Aurora, State of Colorado.
3. Upon forced entry through a garage side door, Donald McGrath, Jeremy Rodgers, and James Scott, in association with the enterprise, stole a [REDACTED] .357 revolver, a [REDACTED] 30-06 bolt-action rifle, a [REDACTED] rifle, an [REDACTED] revolver, a [REDACTED] 9mm

pistol, laptop computers, jewelry, and other property from [REDACTED] and [REDACTED]. The total value of the property was \$14,699.

4. On or about January 25, 2019, James Scott, in association with the enterprise, unlawfully, feloniously, and knowingly possessed the [REDACTED] .357 revolver that was stolen from the burglary at [REDACTED] S. Dawson Way in the City of Aurora, State of Colorado.

5. James Scott had previously been convicted of a felony and was and is not allowed to knowingly possess, use, or carry upon his person a firearm. James Scott was convicted of second degree burglary of a building on or about October 12, 2018, a class four felony, in Denver, Colorado, District Court case number 2017CR1177.

6. Donald McGrath, Jeremy Rodgers, and/or James Scott were identified through surveillance video, stolen property, and interviews.

COUNT SIXTY-SIX

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

Between and including January 25, 2019 and January 29, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 SIXTY-SEVEN

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

On or about January 28, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude DENVER POLICE OFFICER MANDY DAVIS, 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 Counts 66 and 67 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of January 25, 2019 and January 29, 2019, Donald McGrath, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] valued at \$4,400. The vehicle was taken without authorization while it was running in front of [REDACTED] East Purdue Place in the City of Aurora, State of Colorado.
3. On or about January 28, 2019, Donald McGrath, in association with the enterprise, was operating the stolen [REDACTED] when he unlawfully, feloniously, and knowingly eluded Denver Police Officer Mandy Davis, in the area of Hampden Avenue and University Boulevard in the City of Denver, State of Colorado.
4. Donald McGrath drove the [REDACTED] into oncoming traffic and fled the area at a high rate of speed. Officer Davis was operating a marked patrol vehicle with emergency lights activated.
5. Ma. [REDACTED]'s stolen [REDACTED] was recovered by police on January 29, 2019, at 6767 South Clinton Street in the City of Greenwood Village, State of Colorado.

COUNT SIXTY-EIGHT

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

Between and including February 8, 2019 and March 25, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 Count 68 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of February 8, 2019 and March 25, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED], valued at \$5,400. The vehicle was taken without authorization while it was running outside of [REDACTED] East Adriatic Place in the City of Aurora, State of Colorado.
3. Mr. [REDACTED]'s stolen [REDACTED] was recovered by police on March 25, 2019, at 15591 East Batavia Drive in the City of Aurora, State of Colorado.
4. Gerardo Sanchez was identified through interviews.

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

On or about February 9, 2019, at and triable in the City and County of Denver, State of Colorado, JAMES SCOTT 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 [REDACTED] located at [REDACTED] E. GIRARD AVENUE, DENVER, COLORADO with the intent to commit therein the crime of THEFT; in violation of section 18-4-203(1), C.R.S.

The facts supporting Count 69 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 9, 2019, James Scott and an as-yet unidentified enterprise member, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] located at [REDACTED] East Girard Avenue in the City of Denver, State of Colorado.
3. James Scott and the as-yet unidentified enterprise member entered the leasing office and stole resident refund checks, resident checks and money orders, and two resident packages.
4. James Scott was identified through surveillance video.

COUNT SEVENTY

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: [REDACTED] and WILLIAM JOKAY-SZILAGJI was previously convicted of a felony, namely: BURGLARY OF A STRUCTURE CONVEYANCE UNARMED WITHOUT A PERSON INSIDE and FELONY BATTERY, as defined by FLORIDA STATUTE 810.02.4 and 784.041.1, on OCTOBER 10, 2011; in violation of section 18-12-108(1), C.R.S.

COUNT SEVENTY-ONE

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI 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 4 milligrams, per 18-1.3-103.5(3)(a).

COUNT SEVENTY-TWO

SPECIAL OFFENDER, 18-18-407(1)(d)(II) C.R.S. (DF1) <33A46 >

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI committed the felony offense charged in count 71 and the defendant or a confederate of the defendant possessed a firearm to which the defendant or confederate had access in a manner that posed a risk to others during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

COUNT SEVENTY-THREE

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI unlawfully and feloniously possessed a forged instrument, namely: COLORADO DRIVER'S LICENSE, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

COUNT SEVENTY-FOUR

**CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5)
<13083>**

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S:

The facts supporting Counts 70 through 74 are as follows:

1. On or about February 14, 2019, during a police contact at 14772 East Radcliff Place in the City of Aurora, State of Colorado, William Jokay-Szilagji, in association with the enterprise, unlawfully, feloniously, and knowingly possessed a Taurus .38 revolver.
2. William Jokay-Szilagji had previously been convicted of a felony and was and is not allowed to knowingly possess, use, or carry upon his person a firearm. William Jokay-Szilagji was convicted of burglary of a structure conveyance, unarmed without a person inside, and felony battery on or about October 10, 2011, both third degree felonies, in Washington County, Florida, Court case number 672010CF000116CFAXMX.
3. On or about February 14, 2019, William Jokay-Szilagji, in association with the enterprise, unlawfully, feloniously, and knowingly possessed methamphetamine, a schedule II controlled substance. The net weight of the methamphetamine was 1.375 grams.
4. While in possession of the methamphetamine, William Jokay-Szilagji was in possession of a Taurus .38 revolver that was concealed on his person.
5. On or about February 14, 2019, William Jokay-Szilagji, in association with the enterprise, unlawfully and feloniously possessed a forged Colorado driver license with fictitious information.
6. On or about February 14, 2019, William Jokay-Szilagji, in association with the enterprise, unlawfully and feloniously possessed six checks that were lost, stolen, or delivered under mistake. The check account holders were [REDACTED] and [REDACTED] and [REDACTED] and [REDACTED], and [REDACTED]

COUNT SEVENTY-FIVE

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCCRATH unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: RUGER REVOLVER, SAVAGE ARMS RIFLE and WINCHESTER RIFLE, and DONALD MCGRATH was previously convicted of a felony, namely: ESCAPE FROM FUGITIVE HOLD, as defined by C.R.S. 18-8-208(8), on FEBRUARY 8, 2006; in violation of section 18-12-108(1), C.R.S.

COUNT SEVENTY-SIX

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM JOKAY-SZILAGJI unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: TAURUS REVOLVER, and WILLIAM JOKAY-SZILAGJI was previously convicted of a felony, namely: BURGLARY OF A STRUCTURE CONVEYANCE UNARMED WITHOUT A PERSON INSIDE and FELONY BATTERY, as defined by FLORIDA STATUTE 810.02.4 and 784.041.1, on OCTOBER 10, 2011; in violation of section 18-12-108(1), C.R.S.

COUNT SEVENTY-SEVEN

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH unlawfully and feloniously possessed a forged instrument, namely: SOCIAL SECURITY CARDS, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

COUNT SEVENTY-EIGHT

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <§104A>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT SEVENTY-NINE

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH 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 4 grams, per 18-13-103.5(3)(a).

COUNT EIGHTY

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH 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 February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH 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

CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5) <13083>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH and SARAH MCGRATH unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

COUNT EIGHTY-THREE

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

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, **WILLIAM JOKAY-SZILAGJI** 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-FOUR

POSSESSION OF A FORGERY DEVICE, 18-5-706 C.R.S. (F6) <13052>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, **WILLIAM JOKAY-SZILAGJI** unlawfully and feloniously possessed a tool, photographic equipment, printing equipment, or other device adapted, designed, or commonly used for committing or facilitating the commission of an offense involving the unauthorized manufacture, printing, embossing, or magnetic encoding of a financial transaction device or the altering or addition of any uniform product codes, optical characters, or holographic images to a financial transaction device, and intended to use, or knew that some person intended to use the thing possessed, in the commission of unlawfully manufacturing a financial transaction device; in violation of section 18-5-706, C.R.S.

COUNT EIGHTY-FIVE

POSSESSION OF BLANK FINANCIAL TRANSACTION DEVICES, 18-5-705(1),(3) C.R.S. (F5) <13044>

On or about February 14, 2019, at and triable in the City and County of Denver, State of Colorado, **WILLIAM JOKAY-SZILAGJI** unlawfully, feloniously, and without the authorization of the issuer or manufacturer, possessed, controlled, or received from another person, two or more financial transaction devices, which had not been embossed or magnetically encoded with the name of the account holder, personal identification code, expiration date, or other proprietary institutional information, with intent to use, deliver, circulate or sell them, or with intent to cause their use, delivery, circulation or sale; in violation of section 18-5-705(1),(3), C.R.S.

The facts supporting Counts 75 through 85 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 14, 2019, during the execution of a search warrant at [REDACTED] East Radcliff Place in the City of Aurora, State of Colorado, Donald McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly possessed a stolen [REDACTED] revolver, a stolen [REDACTED] bolt-action rifle, and a stolen [REDACTED] rifle. The [REDACTED]

[REDACTED] bolt-action rifle and [REDACTED] rifle were stolen during the burglary listed in Count 63.

3. Donald McGrath had previously been convicted of a felony and was and is not allowed to knowingly possess, use, or carry upon his person a firearm. Donald McGrath was convicted of escape from fugitive hold on or about February 8, 2006, a class five felony, in Adams County, Colorado, District Court case number 2005CR3893.

4. On or about February 14, 2019, William Jokay-Szilagji, during the execution of a search warrant at [REDACTED] East Radcliff Place in the City of Aurora, State of Colorado, in association with the enterprise, unlawfully, feloniously, and knowingly possessed a stolen [REDACTED] bolt-action rifle. William Jokay-Szilagji's fingerprint was located on the stolen rifle.

5. William Jokay-Szilagji had previously been convicted of a felony and was and is not allowed to knowingly possess, use, or carry upon his person a firearm. William Jokay-Szilagji was convicted of burglary of a structure conveyance, unarmed without a person inside, and felony battery on or about October 11, 2011, both third degree felonies, in Washington County, Florida, Court case number 672010CF000116CFAXMX.

6. On or about February 14, 2019, during the execution of a search warrant at 14772 East Radcliff Place in the City of Aurora, State of Colorado, Donald McGrath and Sarah McGrath, in association with the enterprise, unlawfully and feloniously possessed three forged, blank social security cards. ✓

7. On or about February 14, 2019, Donald McGrath and Sarah McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine. The net weight of the methamphetamine was 17.711 grams.

8. Donald McGrath and Sarah McGrath were in possession of an electronic scale that was in the immediate area of the methamphetamine.

9. On or about February 14, 2019, Donald McGrath and Sarah McGrath, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen Pennsylvania birth certificate, Colorado driver license and identification cards, Pennsylvania identification card, two personal checks, and credit card belonging to [REDACTED] without permission.

10. On or about February 14, 2019, Donald McGrath and Sarah McGrath, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen blank personal check belonging to [REDACTED] without permission.

11. On or about February 14, 2019, Donald McGrath and Sarah McGrath, in association with the enterprise, unlawfully and feloniously possessed eight checks and five credit cards that were lost, stolen, or delivered under mistake. The check's account holders were Lincoln Property Company, [REDACTED], [REDACTED], ESSA 2008 LLC, [REDACTED], and [REDACTED]. The credit card account holders were [REDACTED], [REDACTED], [REDACTED], and [REDACTED].

12. On or about February 14, 2019, also during the execution of a search warrant at 14772 East Radcliff Place in the City of Aurora, State of Colorado, William Jokay-Szilagji, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen US Passport belonging to [REDACTED] without permission.

13. On or about February 14, 2019, William Jokay-Szilagji, in association with the enterprise, unlawfully, feloniously, and knowingly possessed an Epson color printer with a printed counterfeit check in the feed tray.

14. On or about February 14, 2019, William Jokay-Szilagji, in association with the enterprise, unlawfully, feloniously possessed more than five blank credit cards that contained embedded microchips.

COUNT EIGHTY-SIX

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

On or about February 17, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: [REDACTED] and JEREMY RODGERS was previously convicted of a felony, namely: FORGERY-GOVERNMENT ISSUED DOCUMENT, as defined by C.R.S. 18-5-102(1)(e), on SEPTEMBER 15, 2014; in violation of section 18-12-108(1), C.R.S.

The facts supporting Count 86 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 17, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully, feloniously, and knowingly possessed an [REDACTED] handgun during a police contact at East Coolidge Place and North Pagosa Way in the City of Aurora, State of Colorado. The handgun was in a vehicle in which Jeremy Rodgers was a passenger.
3. Jeremy Rodgers had previously been convicted of a felony and was and is not allowed to knowingly possess, use, or carry upon his person a firearm. Jeremy Rodgers was convicted of forgery of a government issued document on or about September 15, 2014, a class five felony, in Arapahoe County, Colorado, District Court case number 2014CR1194.

COUNT EIGHTY-SEVEN

THEFT, 18-4-401(1),(2)(i) C.R.S. (F3) <08A16>

Between and including February 19, 2019 and March 21, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly, took a thing of value, namely: MOTOR VEHICLES of AVIS CAR RENTAL and/or BUDGET CAR RENTAL LLC, and/or [REDACTED], and/or PERSONS UNKNOWN TO THE GRAND JURY AT THIS TIME, with the value of one hundred thousand dollars or more but less than one million dollars; in violation of section 18-4-401(1),(2)(i),(6) C.R.S. and intended to deprive AVIS CAR RENTAL and/or BUDGET CAR RENTAL LLC, and/or [REDACTED] and/or PERSONS UNKNOWN TO THE GRAND JURY AT THIS TIME, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(i), C.R.S.

COUNT EIGHTY-EIGHT

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

On or about February 19, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of PERSONS UNKNOWN TO THE GRAND JURY without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of VEHICULAR ELUDING as set forth in section 18-9-116.5, 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 EIGHTY-NINE

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

On or about February 19, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude DENVER POLICE OFFICER JEREMIAH JOHNSON, 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.

COUNT NINETY

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

On or about MARCH 20, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of BUDGET CAR RENTAL LLC., without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of AGGRAVATED MOTOR VEHICLE THEFT OF [REDACTED]'S [REDACTED] as set forth in section 18-4-109, 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 NINETY-ONE

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

Between and including March 20, 2019 and May 30, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 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 NINETY-TWO

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

On or about March 21, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of AVIS CAR RENTAL, without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of IMPERSONATING A PEACE OFFICER as set forth in section 18-8-112, 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 NINETY-THREE

IMPERSONATING A PEACE OFFICER, 18-8-112 C.R.S. (F6) <22113>

On or about March 21, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and falsely pretended to be a peace officer and performed an act in that pretended capacity; in violation of section 18-8-112, C.R.S.

COUNT NINETY-FOUR

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a) C.R.S. (F5) <0804D>

On or about March 21, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of BUDGET CAR RENTAL LLC, without authorization or by threat or deception, and the value of the motor vehicle was twenty thousand dollars or more; in violation of section 18-4-409(4)(a), C.R.S.

COUNT NINETY-FIVE

ASSAULT IN THE THIRD DEGREE, 18-3-204(1)(a); 18-1.3-501(1.5) C.R.S. (M1) <0203A>

On or about March 21, 2019, at and triable in the City and County of Denver, State of Colorado, GERARDO SANCHEZ unlawfully, and knowingly or recklessly, caused bodily injury to DENVER POLICE CORPORAL FRED KITCHENS. Further, the victim was a peace officer engaged in the performance of his duties; in violation of sections 18-3-204(1)(a) and 18-1.3-501(1.5), C.R.S.

The facts supporting Counts 87 through 95 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of February 19, 2019 and March 21, 2019, Gerardo Sanchez, in association with the enterprise, unlawfully, feloniously, and knowingly stole one motor vehicle belonging to Avis Car Rental, two motor vehicles belonging to Budget Car Rental LLC, one motor vehicle belonging to [REDACTED] and one motor vehicle belonging to person(s) unknown to the Grand Jury at this time. The aggregate value of the motor vehicles was \$147,200.
3. On or about February 19, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over a late model [REDACTED] belonging to persons unknown to the Grand Jury at this time, with a value over \$20,000.
4. On or about February 19, 2019, Gerardo Sanchez, in association with the enterprise, was operating the stolen late model [REDACTED] when he unlawfully, feloniously, and knowingly eluded Denver Police Officer Jeremiah Johnson, in the area East 56th Avenue and North Uinta Street in the City of Denver, State of Colorado.
5. Gerardo Sanchez drove the late model [REDACTED] into oncoming traffic, nearly hitting several vehicles, and fled the area at a high rate of speed. Officer Johnson was operating an unmarked patrol vehicle with emergency lights and siren activated.
6. On or about March 20, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over Budget Car Rental's [REDACTED] truck,

valued at \$35,500. The vehicle was taken without authorization from 24050 East 78th Avenue in the City of Denver, State of Colorado.

7. On or about March 20, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED] valued at \$27,975. Gerardo Sanchez used the stolen [REDACTED] truck to facilitate the theft of [REDACTED]'s [REDACTED] at [REDACTED] East Lowry Boulevard in the City of Denver, State of Colorado.

8. Budget Car Rental's [REDACTED] truck was recovered by police on March 25, 2019, at Baltimore Court and Anaheim Way in the City of Denver, State of Colorado.

9. Ms. [REDACTED]'s [REDACTED] was recovered by police on May 30, 2019, at 1050 North Washington Street in the City of Denver, State of Colorado.

10. On or about March 21, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over Avis Car Rental's [REDACTED] valued at \$17,100. The vehicle was taken without authorization from 25500 East 78th Avenue in the City of Denver, State of Colorado.

11. On or about March 21, 2019, Gerardo Sanchez, in association with the enterprise, unlawfully, feloniously, and falsely pretended to be a peace officer while he was stealing the [REDACTED]. When questioned by Avis Car rental employees, Gerardo Sanchez flashed his gold belt buckle and claimed to be a police officer. Gerardo Sanchez abandoned the Dodge Journey and fled the area.

12. On or about March 21, 2019, Gerardo Sanchez, in association with the enterprise, knowingly obtained or exercised control over Budget Car Rental's 2018 GMC Yukon, valued at \$46,625. The vehicle was taken without authorization from 25340 East 78th Avenue in the City of Denver, State of Colorado.

13. On or about March 21, 2019, Gerardo Sanchez, in association with the enterprise, unlawfully, and knowingly or recklessly, caused bodily injury to Denver Police Corporal Fred Kitchens while Corporal Kitchens was attempting to take Gerardo Sanchez into custody at 6805 Argonne Street in the City of Denver, State of Colorado. Corporal Kitchens suffered injuries including a [REDACTED].

14. On or about March 21, 2019, Budget Car Rental's [REDACTED] was recovered by police at 6805 Argonne Street in the City of Denver, State of Colorado.

COUNT NINETY-SIX

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 NINETY-SEVEN

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY with the intent to defraud [REDACTED] 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: MONEY ORDER; in violation of section 18-5-102(1)(c), C.R.S.

COUNT NINETY-EIGHT

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 NINETY-NINE

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY with the intent to defraud [REDACTED] 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: MONEY ORDER; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 ONE HUNDRED ONE

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY with the intent to defraud [REDACTED] 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: MONEY ORDER; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED TWO

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

On or about February 23, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 of [REDACTED] and [REDACTED], with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive [REDACTED] and [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT ONE HUNDRED THREE

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about February 25, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY unlawfully and feloniously possessed a forged instrument, namely: MONTANA DRIVER LICENSE, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

COUNT ONE HUNDRED FOUR

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

On or about February 25, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 ONE HUNDRED FIVE

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

On or about February 25, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY with the intent to defraud [REDACTED] 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: MONEY ORDER; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED SIX

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

On or about February 25, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY 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 ONE HUNDRED SEVEN

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

On or about February 25, 2019, at and triable in the City and County of Denver, State of Colorado, ROBERT STANLEY with the intent to defraud [REDACTED] 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: MONEY ORDER; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 96 through 107 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about February 23, 2019, Robert Stanley, in association with the enterprise, unlawfully, feloniously, and knowingly cashed a stolen money order belonging to [REDACTED] without permission. The \$550 money order issued to [REDACTED] was cashed at the Moneytree located at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.
3. Robert Stanley, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely uttered the stolen money order to Moneytree employees.
4. On or about February 23, 2019, Robert Stanley, in association with the enterprise, unlawfully, feloniously, and knowingly cashed a stolen money order belonging to [REDACTED] without permission. The \$1,000 money order issued to [REDACTED] was cashed at the Moneytree located at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.
5. Robert Stanley, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely uttered the stolen money order to Moneytree employees.
6. On or about February 23, 2019, Robert Stanley, in association with the enterprise, unlawfully, feloniously, and knowingly cashed a stolen money order belonging to [REDACTED] without permission. The \$1,000 money order was cashed at the Moneytree located at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.
7. Robert Stanley, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely uttered the stolen money order to Moneytree employees.
8. On or about February 23, 2019, Robert Stanley, in association with the enterprise, stole a total of \$2,100 from [REDACTED], [REDACTED], and a person unknown to the Grand Jury at this time, when he received proceeds from three stolen money orders.
9. On or about February 25, 2019, Robert Stanley, in association with the enterprise, unlawfully and feloniously possessed a forged Montana driver license with fictitious information at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.
10. On or about February 25, 2019, Robert Stanley, in association with the enterprise, unlawfully, feloniously, and knowingly attempted to cash a stolen money order belonging to [REDACTED] without permission. The \$1,000 money order issued to David Fisher was presented to the Moneytree located at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.
11. Robert Stanley, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely uttered the stolen money order to Moneytree employees.

12. On or about February 25, 2019, Robert Stanley, in association with the enterprise, unlawfully, feloniously, and knowingly attempted to cash a stolen money order belonging to [REDACTED] without permission. The \$550 money order issued to [REDACTED] was presented to the Moneytree located at 12862 East Mississippi Avenue in the City of Aurora, State of Colorado.

13. Robert Stanley, in association with the enterprise, defrauded [REDACTED] when he unlawfully, feloniously, and falsely uttered the stolen money order to Moneytree employees.

14. Robert Stanley was identified through video surveillance.

COUNT ONE HUNDRED EIGHT

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

Between and including February 27, 2019 and March 6, 2019, at and triable in the City and County of Denver, State of Colorado, ANTON PLEASANT unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 NINE

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, ANTON PLEASANT unlawfully and feloniously possessed a forged instrument, namely: US CURRENCY, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

The facts supporting Counts 108 and 109 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of February 27, 2019 and March 6, 2019, Anton Pleasant, in association with the enterprise, knowingly obtained or exercised control over [REDACTED] valued at \$17,000. The vehicle was taken without authorization while it was running in front of [REDACTED] West Ottawa Avenue in the City of Littleton, State of Colorado.
3. On March 6, 2019, police contacted Anton Pleasant while he was in physical control of the [REDACTED] at 934 South Oury Street in the City of Aurora, State of Colorado.
4. On or about March 6, 2019, Anton Pleasant, in association with the enterprise, unlawfully and feloniously possessed two counterfeit \$20 bills during a police contact at 934 South Oury Street in the City of Aurora, State of Colorado.

COUNT ONE HUNDRED TEN

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **KAREN ANDRES** with the intent to defraud **US BANK**, 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; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED ELEVEN

CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5) <13083>

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **KAREN ANDRES** and **LEE SWINK** unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

COUNT ONE HUNDRED TWELVE

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado; **KAREN ANDRES** and **LEE SWINK** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] aka [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 THIRTEEN

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <8104A>

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **KAREN ANDRES** and **LEE SWINK** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute **METHAMPHETAMINE**, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(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 March 6, 2019, at and triable in the City and County of Denver, State of Colorado, KAREN ANDRES and LEE SWINK 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 4 grams, per 18-1.3-103.5(3)(a).

COUNT ONE HUNDRED FIFTEEN

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE - SCHEDULE I OR II, 18-18-405(1),(2)(c)(I) C.R.S. (DF3) <§1046>

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, KAREN ANDRES and LEE SWINK unlawfully, feloniously, and knowingly possessed with intent to sell or distribute COCAINE, a schedule I or II controlled substance; in violation of section 18-18-405(1), C.R.S. and 18-18-405(2)(c)(I)(A), 2013 Colo. Sess. Laws 1911.

COUNT ONE HUNDRED SIXTEEN

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, KAREN ANDRES and LEE SWINK unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained COCAINE, 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 4 grams.

COUNT ONE HUNDRED SEVENTEEN

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, KAREN ANDRES and LEE SWINK unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained HEROIN, 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 4 milligrams, per 18-1.3-103.5(3)(a).

COUNT ONE HUNDRED EIGHTEEN

SPECIAL OFFENDER, 18-18-407(1)(d)(II) C.R.S. (DF1) <33A46>

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **KAREN ANDRES** and **LEE SWINK** committed the felony offenses charged in counts 113, 114, 115, 116, and 117 and the defendant or a confederate of the defendant possessed a firearm to which the defendant or confederate had access in a manner that posed a risk to others during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

COUNT ONE HUNDRED NINETEEN

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **ALBERTO BENIPAYO** 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 TWENTY

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **ALBERTO BENIPAYO** with the intent to defraud [REDACTED] and [REDACTED] 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; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED TWENTY-ONE

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

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **ALBERTO BENIPAYO** 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 ONE HUNDRED TWENTY-TWO

**CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5)
<13083>**

On or about March 6, 2019, at and triable in the City and County of Denver, State of Colorado, **ALBERTO BENIPAYO** unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

The facts supporting Counts 110 through 122 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about March 6, 2019, during the execution of a search warrant at 934 South Oury Street in the City of Aurora, State of Colorado, Karen Andres, in association with the enterprise, defrauded US Bank when she unlawfully, feloniously, and falsely altered the amount of a check issued by US Bank to Karen Andres.
3. On or about March 6, 2019, during the execution of a search warrant at 934 South Oury Street in the City of Aurora, State of Colorado, Karen Andres and Lee Swink, in association with the enterprise, unlawfully and feloniously possessed five checks and one debit card that were lost, stolen, or delivered under mistake. The checks' account holders were Civil Attributions LLC, US Bank, DEXSTA Federal Credit Union, [REDACTED] and [REDACTED] and [REDACTED] and [REDACTED]. The debit card's account holder was [REDACTED].
4. On or about March 6, 2019, Karen Andres and Lee Swink, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen Colorado driver license and two debit cards belonging to [REDACTED] aka [REDACTED] without permission.
5. On or about March 6, 2019, Karen Andres and Lee Swink 14, 2019, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute methamphetamine, a schedule II controlled substance. The total net weight of the methamphetamine was 51.754 grams.
6. On or about March 6, 2019, Karen Andres and Lee Swink, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute cocaine, a schedule II controlled substance. The net weight of the cocaine was 6.834 grams.
7. On or about March 6, 2019, Karen Andres and Lee Swink, in association with the enterprise, unlawfully, feloniously, and knowingly possessed heroin, a schedule I controlled substance. The net weight of the heroin was .915 gram.
8. Karen Andres and Lee Swink were in possession of an electronic scale, zip-close baggies, and US currency that were in the immediate area of the methamphetamine and cocaine.

9. While in possession of the methamphetamine, cocaine, and heroin, Karen Andres and Lee Swink were in possession of a Glock 43 9mm handgun, a McDuffee Arms .223 rifle, and a Marlin Model 60 rifle. The firearms were located in a safe with the drugs.

10. On or about March 6, 2019, during the execution of a search warrant at 934 South Ouray Street in the City of Aurora, State of Colorado, Alberto Benipayo, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen check and document containing personal identifying information belonging to [REDACTED] without permission.

11. On or about March 6, 2019, Alberto Benipayo, in association with the enterprise, defrauded [REDACTED] and [REDACTED] when he unlawfully, feloniously, and falsely altered the name and amount on a stolen check from the bank account of [REDACTED] and [REDACTED].

12. On or about March 6, 2019, Alberto Benipayo, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen personal check belonging to [REDACTED] and [REDACTED] without permission.

13. On or about March 6, 2019, Alberto Benipayo, in association with the enterprise, unlawfully and feloniously possessed seven checks, one credit card, and one debit card that were lost, stolen, or delivered under mistake. The checks' account holders were US Treasury, Twin Lake Towers Registered LLP, Elite Industries Inc., Pro Line Excavating LLC, and Davita Savings Plan. The credit card's account holder was [REDACTED] and the debit card belonged to [REDACTED].

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 12, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] of [REDACTED], without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE as set forth in section 18-4-409(4)(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 AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a); 18-2-101 C.R.S. (F6) <0804DA>

On or about March 12, 2019, at and triable in the City and County of Denver, State of Colorado, by engaging in conduct constituting a substantial step toward the commission of aggravated motor vehicle theft in the second degree, DONALD MCGRATH unlawfully, feloniously, and knowingly attempted to obtain or exercise control over the motor vehicle, [REDACTED] of A-1 AUTO SALES, without authorization or by threat or deception, and the value of the motor vehicle was twenty thousand dollars or more; in violation of sections 18-4-409(4)(a), and 18-2-101, C.R.S.

COUNT ONE HUNDRED TWENTY-FIVE

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about March 12, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH unlawfully and feloniously possessed a forged instrument, namely: US CURRENCY, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

COUNT ONE HUNDRED TWENTY-SIX

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

On or about March 12, 2019, at and triable in the City and County of Denver, State of Colorado, DONALD MCGRATH 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 4 milligrams, per 18-1.3-103.5(3)(a).

The facts supporting Counts 123 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 12, 2019, Donald McGrath, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED], valued at \$13,150. The vehicle was taken without authorization while it was running in the driveway of [REDACTED] North Iola Street in the City of Aurora, State of Colorado.
3. On or about March 12, 2019, Donald McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly attempted to steal A-1 Auto Sales' [REDACTED] at [REDACTED] South Havana Street in the City of Aurora, State of Colorado. Donald McGrath was attempting to trade the stolen [REDACTED] for the [REDACTED] when he was contacted by police.
4. On or about March 12, 2019, Donald McGrath, in association with the enterprise, unlawfully and feloniously possessed three counterfeit \$20 bills at 1990 South Havana Street in the City of Aurora, State of Colorado.
5. On or about March 12, 2019, Donald McGrath, in association with the enterprise, unlawfully, feloniously, and knowingly possessed methamphetamine, a schedule II controlled substance. The total net weight of the methamphetamine was .953 gram.

COUNT ONE HUNDRED TWENTY-SEVEN

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

On or about April 12, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS and ESSENCE FORSEY 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 [REDACTED], located at [REDACTED] PARK MEADOWS DRIVE [REDACTED], LITTLETON, CO 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-EIGHT

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

Between and including April 12, 2019 and April 13, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS and ESSENCE FORSEY 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, HANDBAGS, WALLET, GIFT CARDS, CREDIT CARDS, and SUNGLASSES of [REDACTED], with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT ONE HUNDRED TWENTY-NINE

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

On or about April 13, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS and ESSENCE FORSEY 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 ONE HUNDRED THIRTY

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

On or about April 13, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS and ESSENCE FORSEY 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 ONE HUNDRED THIRTY-ONE

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

On or about April 13, 2019, at and triable in the City and County of Denver, State of Colorado, **JEREMY RODGERS** and **ESSENCE FORSEY** 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 ONE HUNDRED THIRTY-TWO

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

On or about April 13, 2019, at and triable in the City and County of Denver, State of Colorado, **JEREMY RODGERS** 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.

The facts supporting Counts 127 through 132 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about April 12, 2019, Jeremy Rodgers and Essence Forsey, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED]'s garage located at [REDACTED] Park Meadows Drive, Unit 2914, in the City of Littleton, County of Douglas, State of Colorado.
3. Jeremy Rodgers and Essence Forsey stole handbags, a wallet, credit cards, gift cards, sunglasses, and other property, valued at a total of \$2,476, from Ms. [REDACTED]'s vehicle that was parked in the garage.
4. On or about April 13, 2019, Jeremy Rodgers and Essence Forsey, in association with the enterprise, unlawfully, feloniously, and knowingly used stolen credit cards belonging to [REDACTED] without permission. Jeremy Rodgers and Essence Forsey used the credit cards to make fraudulent purchases at retail locations in the Denver metropolitan area.
5. Jeremy Rodgers and Essence Forsey utilized [REDACTED]'s stolen credit card to make one purchase from the Walmart located at 6675 Business Center Drive in the City of Highlands Ranch, State of Colorado.
6. Jeremy Rodgers and Essence Forsey utilized [REDACTED]'s stolen credit card to make one purchase from the Target located at 6767 South Clinton Street in the City of Greenwood Village, State of Colorado.

7. Jeremy Rodgers and Essence Forsey utilized [REDACTED]'s stolen credit card to make one purchase from the Kohl's located at 6384 South Parker Road in the City of Aurora, State of Colorado.
8. Jeremy Rodgers utilized [REDACTED]'s stolen credit card to make one purchase from the Big 5 Sporting Goods located at 10051 East Iliff Avenue in the City of Aurora, State of Colorado.
9. Jeremy Rodgers and Essence Forsey were identified through store surveillance video.

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

On or about May 4, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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] S. BOSTON COURT, ENGLEWOOD, 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 ONE HUNDRED THIRTY-FOUR
THEFT, 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

On or about May 4, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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: COMPUTER, SAFE, ELECTRONICS, and PURSE of [REDACTED] and [REDACTED], with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive [REDACTED] and [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

The facts supporting Counts 133 and 134 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 4, 2019, Jeremy Rodgers and as-yet unidentified enterprise members, in association with the enterprise, unlawfully feloniously, and knowingly broke into the residence of [REDACTED] and [REDACTED] located at [REDACTED] South Boston Court, in the City of Englewood, State of Colorado.
3. After entry was made, Jeremy Rodgers and as-yet unidentified enterprise members, in association with the enterprise, stole a computer, safe, three Apple iPads, and a purse, with a total value of \$5,900.
4. Jeremy Rodgers was identified through video surveillance and stolen property.

COUNT ONE HUNDRED THIRTY-FIVE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <§104A>

On or about May 8, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute METHAMPHETAMINE, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT ONE HUNDRED THIRTY-SIX

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

On or about May 8, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLIAMSEN 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 4 grams, per 18-1.3-103.5(3)(a).

The facts supporting Counts 135 and 136 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 8, 2019, Jennifer Williamsen, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute methamphetamine, a schedule II controlled substance, during a police contact at 5500 East Iliff Avenue in the City of Denver, State of Colorado. The net weight of the methamphetamine was 7.347 grams.
3. Jennifer Williamsen was in possession of US currency totaling \$211 that was stored with the methamphetamine.

COUNT ONE HUNDRED THIRTY-SEVEN

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

On or about May 15, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 [REDACTED], located at [REDACTED] E. BETHANY DRIVE [REDACTED], AURORA, 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 THIRTY-EIGHT

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

On or about May 19, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 [REDACTED], located at [REDACTED] ROSEMONT AVENUE, LONE TREE, 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 THIRTY-NINE

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

On or about MAY 20, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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.

The facts supporting Counts 137 through 139 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 15, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] located at [REDACTED] East Bethany Drive, [REDACTED], in the City of Aurora, State of Colorado.
3. After entry was gained, Jeremy Rodgers stole professional hair and make-up kits, a business checkbook, cash, and customer checks.
4. Jeremy Rodgers was identified through surveillance video.
5. On or about May 19, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly broke into [REDACTED] apartment complex located at [REDACTED] Rosemont Avenue in the City of Lone Tree, State of Colorado.

6. After entry was gained, Jeremy Rogers stole a wall-mounted safe that contained resident rent checks and money orders, gift cards, and a company credit card bearing [REDACTED]'s name.

7. On or about May 20, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully, feloniously, and knowingly used the stolen credit card belonging to [REDACTED] without permission. Jeremy Rodgers utilized [REDACTED]'s stolen credit card to make one purchase from the Dick's Sporting Goods located at 8501 West Bowles Avenue in the City of Littleton, State of Colorado.

8. Jeremy Rodgers was identified through stolen property and a fraudulent credit card transaction.

COUNT ONE HUNDRED FORTY

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

Between and including March 1, 2019 and May 24, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS and ESSENCE FORSEY unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 FORTY-ONE

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

On or about May 24, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 FORTY-TWO

CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5) <13083>

On or about May 24, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

COUNT ONE HUNDRED FORTY-THREE

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

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 4 milligrams, per 18-1.3-103.5(3)(a).

COUNT ONE HUNDRED FORTY-FOUR

POSSESSION OF FORGED INSTRUMENT, 18-5-105 C.R.S. (F6) <10040>

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS unlawfully and feloniously possessed a forged instrument, namely: US CURRENCY, with knowledge that it was forged and with intent to use the instrument to defraud; in violation of section 18-5-105, C.R.S.

COUNT ONE HUNDRED FORTY-FIVE

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

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 FORTY-SIX

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

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 FORTY-SEVEN

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

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 FORTY-EIGHT
IDENTITY THEFT, 18-5-902(1)(b) C.R.S. (F4) <1307H>

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS 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 FORTY-NINE
**CRIMINAL POSSESSION OF A FINANCIAL DEVICE, 18-5-903(1),(2)(c) C.R.S. (F5)
<13083>**

On or about May 28, 2019, at and triable in the City and County of Denver, State of Colorado, JEREMY RODGERS unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

The facts supporting Counts 140 through 149 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of March 1, 2019 and May 24, 2019, Jeremy Rodgers and Essence Forsey, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED], valued at \$10,025. The vehicle was taken without authorization from [REDACTED] North Jackson Street in the City of Denver, State of Colorado.
3. Mr. [REDACTED]'s [REDACTED] was recovered by police on May 24, 2019, at 11503 East Cornell Avenue in the City of Aurora, State of Colorado.
4. On or about May 24, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen blank personal check belonging to [REDACTED] without permission inside the stolen [REDACTED] vehicle located at [REDACTED] East Cornell Avenue in the City of Aurora, State of Colorado.
5. On or about May 24, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully and feloniously possessed seven checks, one credit card, and ten money orders that were lost, stolen, or delivered under mistake. The check account holders were [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. The credit card account holder was [REDACTED].

6. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully, feloniously, and knowingly possessed methamphetamine, a schedule II controlled substance during a police contact at 3058 South Macon Circle in the City of Aurora, State of Colorado. The total net weight of the methamphetamine was .510 gram.
7. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully and feloniously possessed six counterfeit \$20 bills.
8. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen RTD Pass and American Express credit card belonging to [REDACTED] without permission.
9. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen Colorado driver license belonging to [REDACTED] without permission.
10. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen or misplaced personal checkbook with blank checks belonging to [REDACTED] without permission.
11. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully feloniously, and knowingly possessed a stolen health insurance card, dental insurance card, and AAA card belonging to [REDACTED] without permission.
12. On or about May 28, 2019, Jeremy Rodgers, in association with the enterprise, unlawfully and feloniously possessed more than 100 personal and business checks that were lost, stolen, or delivered under mistake. The checks were drawn on bank accounts of more than ten different individuals and businesses.
13. Jeremy Rodgers and/or Essence Forsey were identified through fingerprint evidence and/or stolen or misplaced property.

COUNT ONE HUNDRED FIFTY

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

Between and including May 25, 2019 and June 20, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 FIFTY-ONE

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

Between and including June 10, 2019 and July 1, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle, [REDACTED] 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 FIFTY-TWO

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

On or about June 14, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES and BRITTANY GIARDINO 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 ONE HUNDRED FIFTY-THREE

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

On or about June 14, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES and BRITTANY GIARDINO 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 ONE HUNDRED FIFTY-FOUR

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

On or about June 14, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **BRITTANY GIARDINO** 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 ONE HUNDRED FIFTY-FIVE

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

On or about June 14, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **BRITTANY GIARDINO** 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 ONE HUNDRED FIFTY-SIX

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** 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 ONE HUNDRED FIFTY-SEVEN

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **BRITTANY GIARDINO** 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 ONE HUNDRED FIFTY-EIGHT

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **BRITTANY GIARDINO** 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 ONE HUNDRED FIFTY-NINE

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **ESTEVAN BARRIENTOS** 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 ONE HUNDRED SIXTY

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **ESTEVAN BARRIENTOS** 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 ONE HUNDRED SIXTY-ONE

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

On or about June 15, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** and **ESTEVAN BARRIENTOS** 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 ONE HUNDRED SIXTY-TWO

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** 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 ONE HUNDRED SIXTY-THREE

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** 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 ONE HUNDRED SIXTY-FOUR

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** 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 ONE HUNDRED SIXTY-FIVE

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, **THOMAS BRIDGES** 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 ONE HUNDRED SIXTY-SIX

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES 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 ONE HUNDRED SIXTY-SEVEN

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

On or about June 16, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES 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 ONE HUNDRED SIXTY-EIGHT

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

On or about June 17, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES 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 ONE HUNDRED SIXTY-NINE

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

On or about June 17, 2019, at and triable in the City and County of Denver, State of Colorado, THOMAS BRIDGES 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.

The facts supporting Counts 150 through 169 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including the dates of May 25, 2019 and June 20, 2019, Thomas Bridges, in association with the enterprise, knowingly obtained or exercised control over [REDACTED]'s [REDACTED]

████████ SUV, valued at \$9,850. The vehicle was taken without authorization from ██████ South Quebec Way in the City of Denver, State of Colorado.

3. Mr. ██████'s ██████████ SUV was recovered by police on June 20, 2019, at 200 North Bellaire Street in the City of Denver, State of Colorado.

4. Between and including the dates of June 10, 2019 and July 1, 2019, Thomas Bridges, in association with the enterprise, knowingly obtained or exercised control over ██████████'s ██████████ SUV, valued at \$15,550. The vehicle was taken without authorization during a burglary at ██████ West Mansfield Parkway, Unit ██████, in the City of Lakewood, State of Colorado.

5. Mr. ██████'s ██████████ SUV was recovered by police on July 1, 2019, at ██████ South Quebec Street in the County of Arapahoe, State of Colorado.

6. Between and including the dates of June 14, 2019 and June 17, 2019, Thomas Bridges, Brittany Giardino, and/or Estevan Barrientos, in association with the enterprise, unlawfully, feloniously, and knowingly used stolen credit cards belonging to ██████████ and ██████████ without permission. Thomas Bridges, Estevan Barrientos, and/or Brittany Giardino used the credit cards to make fraudulent purchases at retail locations in the Denver metropolitan area.

7. On or about June 14, 2019, Thomas Bridges and Brittany Giardino utilized ██████████'s stolen credit card to make one purchase from the Walmart located at 601 Englewood Parkway in the City of Englewood, State of Colorado.

8. On or about June 14, 2019, Thomas Bridges and Brittany Giardino utilized ██████████'s stolen credit card to make one purchase from the Walgreens located at 1235 East Evans Avenue in the City of Denver, State of Colorado. Thomas Bridges attempted a second transaction at the Walgreens that was voided.

9. On or about June 14, 2019, Thomas Bridges and Brittany Giardino utilized ██████████'s stolen credit card to attempt one transaction at the Walmart located at 14000 East Exposition Avenue in the City of Aurora, State of Colorado.

10. On or about June 15, 2019, Thomas Bridges utilized ██████████'s stolen credit card to attempt one transaction at the PacSun located at 3000 East 1st Avenue in the City of Denver, State of Colorado.

11. On or about June 15, 2019, Thomas Bridges and Brittany Giardino utilized ██████████'s stolen credit card to make two separate purchases from the Macy's located at 15 South Steele Street in the City of Denver, State of Colorado.

12. On or about June 15, 2019, Thomas Bridges and Estevan Barrientos utilized ██████████'s stolen credit card and loyalty rewards account information to make three separate purchases from the Macy's located at 6801 South University Boulevard in the City of Centennial, State of Colorado.

13. On or about June 16, 2019, Thomas Bridges utilized [REDACTED]'s stolen credit card and loyalty rewards account information to make four separate purchases from the Macy's located at 8298 East Northfield Boulevard in the City of Denver, State of Colorado.

14. On or about June 16, 2019, Thomas Bridges utilized [REDACTED]'s stolen credit card and loyalty rewards account information to make two separate purchases from the Macy's located at 15 South Steele Street in the City of Denver, State of Colorado.

15. On or about June 17, 2019, Thomas Bridges utilized Marie Zeidler's stolen loyalty rewards account information to conduct two separate transactions at the Macy's located at 8298 East Northfield Boulevard in the City of Denver, State of Colorado.

16. Thomas Bridges, Brittany Giardino, and Estevan Barrientos were identified through video surveillance.

COUNT ONE HUNDRED SEVENTY

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(b)(I)(B) C.R.S. (DF2) <§104A>

On or about August 2, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLAMSEN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute METHAMPHETAMINE a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT ONE HUNDRED SEVENTY-ONE

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

On or about August 2, 2019, at and triable in the City and County of Denver, State of Colorado, JENNIFER WILLAMSEN 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 4 grams, per 18-1.3-103.5(3)(a).

COUNT ONE HUNDRED SEVENTY-TWO

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

On or about August 2, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM CARSON 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), Further, the amount possessed was more than 2 grams, per 18-1.3-103.5(3)(a).

COUNT ONE HUNDRED SEVENTY-THREE

POSSESSION OF A CONTROLLED SUBSTANCE - SCHEDULE III, IV, OR V, 18-18-403.5(1),(2)(c) C.R.S. (DM1) <§3016>

On or about August 2, 2019, at and triable in the City and County of Denver, State of Colorado, WILLIAM CARSON unlawfully and knowingly possessed a material, compound, mixture, or preparation that contained DIAZAPAM, a schedule III, IV or V controlled substance; in violation of section 18-18-403.5(1),(2)(c), C.R.S.

The facts supporting Counts 170 through 173 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 2, 2019, Jennifer Williamsen, in association with the enterprise, unlawfully, feloniously, and knowingly possessed with the intent distribute methamphetamine, a

schedule II controlled substance, during a search warrant at 5124 East Warrant Avenue, Unit 5A, in the City of Denver, State of Colorado. The net weight of the methamphetamine was 10.368 grams.

3. Jennifer Williamsen was in possession of multiple zip-close bags of methamphetamine and US currency totaling \$118.

4. On or about August 2, 2019, William Carson, in association with the enterprise, unlawfully, feloniously, and knowingly possessed methamphetamine, a schedule II controlled substance, during a search warrant at 5124 East Warren Avenue, Unit 5A, in the City of Denver, State of Colorado. The net weight of the methamphetamine was 2.589 grams.

5. On or about August 2, 2019, William Carson, in association with the enterprise, unlawfully, feloniously, and knowingly possessed diazepam, a schedule IV controlled substance. The net weight of the diazepam was 2.513 grams.