

District Court, City and County of Denver, Colorado City and County Building, Room 424 1437 Bannock Street Denver, CO 80202	<p style="text-align: center;">COURT USE ONLY</p>
<p><b>Plaintiff:</b> THE PEOPLE OF THE STATE OF COLORADO</p> <p><b>Defendants:</b></p> <p><b>MIRIAM ALVAREZ</b>  <b>ALAN LOPEZ-REYES</b>  <b>PEDRO MARRUFO-GARCIA</b>  <b>ROBERT MILLS</b>  <b>URIEL URENO-GARCIA</b></p>	
<b>INDICTMENT</b>	

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

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a) C.R.S. (F5 ) <0804G > 3, 5, 10, 11, 15, 23, 26 (7 counts)

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, 18-18-405(1),(2)(c)(II) C.R.S. (DF3) <81049> 4 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - WITH TWO OR MORE PRIORS, 18-4-409(2),(3)(b) C.R.S. (F3) <08043> 6, 14 (2 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, 18-4-409(2),(3)(a.5) C.R.S. (F4 ) <0804H > 7, 28, 30 (3 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b) C.R.S. (F6) <0804E> 8, 18, 19, 24, 29 (5 counts)

INTRODUCING CONTRABAND IN THE FIRST DEGREE, 18-8-203(1)(a) C.R.S. (F4) <23041> 9 (1 count)

FIRST DEGREE CRIMINAL TRESPASS, 18-4-502 C.R.S. (F5) <09023> 12, 27 (2 counts)

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307G> 13 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(a) C.R.S. (F5) <0804D> 16, 21, 22 (3 counts)

CRIMINAL ATTEMPT TO COMMIT AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(b);18-2-101 C.R.S. (F6) <0804EA> 17 (1 count)

POSSESSION OF A CONTROLLED SUBSTANCE, 18-18-403.5(1),(2)(a) C.R.S. (DF4) <8101B > 20, 31 (2 counts)

RECKLESS DRIVING, 42-4-1401 C.R.S. (T2) <73301> 25 (1 count)

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

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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Martin F. Egelhoff  
Presiding Judge  
Denver District Court

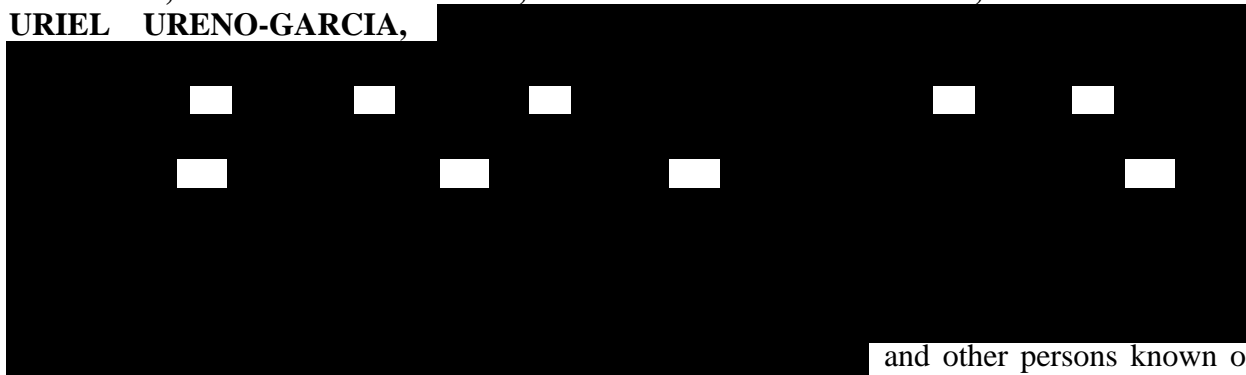
**COUNT ONE**

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

Between and including **February 1, 2018 and June 24, 2020**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ, ALAN LOPEZ-REYES, PEDRO MARRUFO-GARCIA, ROBERT MILLS, and URIEL URENO-GARCIA**, 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: **MIRIAM ALVAREZ, ALAN LOPEZ-REYES, PEDRO MARRUFO-GARCIA, ROBERT MILLS, URIEL URENO-GARCIA,**



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 **MIRIAM ALVAREZ**, the acts described in counts 2, 6, 13, 14, 16, 17, and 18, including any lesser included offenses of these counts, and Predicate Acts 32, 33 and 42 of this Indictment.

As to **ALAN LOPEZ-REYES**, the acts described in counts 2, 4, 8, 9, 10, 11, 26, 28, 29, 30, and 31, including any lesser included offenses of these counts, and Predicate Act 36 of this Indictment.

As to **PEDRO MARRUFO-GARCIA**, the acts described in counts 2, 3, 7, 13, 15, 16, 17, and 18, including any lesser included offenses of these counts, and Predicate Acts 35, 38 and 43 of this Indictment.

As to **ROBERT MILLS**, the acts described in counts 2, 15, 16, 17, 18, 21, 22, 23, and 24, including any lesser included offenses of these counts, and Predicate Acts 39, 40 and 41 of this Indictment.

As to **URIEL URENO-GARCIA**, the acts described in counts 2, 5, 19, 20, and 28, including any lesser included offenses of these counts, and Predicate Acts 34 and 37 of this Indictment.

### **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 **February 1, 2018 and June 24, 2020**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ, ALAN LOPEZ-REYES, PEDRO MARRUFO-GARCIA, ROBERT MILLS, and URIEL URENO-GARCIA**, 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.

### **PREDICATE ACT 32**

**AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(C), C.R.S. (M1) <0804F>**

On or about **February 7, 2018**, **MIRIAM ALVAREZ** unlawfully and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S.

### **PREDICATE ACT 33**

**AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(C), C.R.S. (M1) <0804F>**

On or about **March 14, 2018**, **MIRIAM ALVAREZ** unlawfully and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S.

**PREDICATE ACT 34**

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>

On or about **April 23, 2018**, **URIEL URENO-GARCIA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute **HEROIN**, 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), C.R.S.

**PREDICATE ACT 35**

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

On or about **July 23, 2018**, **PEDRO MARRUFO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], 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.

**PREDICATE ACT 36**

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(C), C.R.S. (M1) <0804F>

On or about **DECEMBER 27, 2018**, **ALAN LOPEZ-REYES** unlawfully and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S.

**PREDICATE ACT 37**

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) (F6) <0804E>

Between and including **March 3, 2019 and March 5, 2019**, **URIEL URENO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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.

**PREDICATE ACT 38**

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(C), C.R.S. (M1) <0804F>

Between and including **March 15, 2019 and March 16, 2019**, **PEDRO MARRUFO-GARCIA** unlawfully and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S.

**PREDICATE ACT 39**

CRIMINAL ATTEMPT TO COMMIT ROBBERY, 18-4-301(1);18-2-101, C.R.S. (F5)  
<07011A>

On or about **July 27, 2019**, by engaging in conduct constituting a substantial step toward the commission of robbery, **ROBERT MILLS** unlawfully, feloniously, and knowingly attempted to take a thing of value, namely: **MOTOR VEHICLE**, from the person or presence of [REDACTED] by the use of force, threats or intimidation; in violation of sections 18-4-301(1) and 18-2-101, C.R.S.

**PREDICATE ACT 40**

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, 18-4-409(4)(C),  
C.R.S. (M1) <0804F>

On or about **July 28, 2019**, **ROBERT MILLS** unlawfully and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S.

**PREDICATE ACT 41**

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>

On or about **August 17, 2019**, **ROBERT MILLS** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute **HEROIN**, 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), C.R.S.

**PREDICATE ACT 42**

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000 - \$100,000,  
C.R.S. 18-4-409(2),(3)(A.5) (F4) <0804H>

On or about **December 16, 2019**, **MIRIAM ALVAREZ** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was 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.

**PREDICATE ACT 43**

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000,  
C.R.S. 18-4-409(4)(B) (F6) <0804E>

On or about **January 3, 2020**, **PEDRO MARRUFO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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.

The facts supporting Counts 1 and 2 are as follows:

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

2. From at least February 1, 2018 through June 24, 2020, with various members joining at various times, Miriam Alvarez, Alan Lopez-Reyes, Pedro Marrufo-Garcia, Robert Mills, and Uriel Ureno-Garcia, and other persons known or unknown, including, but not limited to, [REDACTED]

[REDACTED] 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 motor vehicles, stolen money, stolen weapons, stolen tools, stolen identification documents, stolen financial transaction devices, stolen merchandise, stolen electronic devices, and other stolen property. Members of the enterprise obtained stolen property in Colorado primarily through stealing motor vehicles, trespassing motor vehicles, and by committing identity theft. Enterprise members sold and / or traded stolen property through a variety of methods including, but not limited to, face-to-face meetings on the street.

3. During all times relevant to this Indictment, enterprise members concentrated on stealing Ford F-Series trucks, Chevrolet Silverado trucks, and various other types of motor vehicles from parking lots and hotels in and around Denver International Airport (“DIA”) located in the City and County of Denver, State of Colorado. Enterprise members also stole motor vehicles from rental car lots located at DIA. Enterprise members also stole motor vehicles from other locations in and around the Denver metropolitan area.

4. During all times relevant to this Indictment, members of the enterprise including, but not limited to, Miriam Alvarez, Alan Lopez-Reyes, Pedro Marrufo-Garcia, Robert Mills, and Uriel Ureno-Garcia, working in concert with each other and / or with persons known and unknown to the Grand Jury, stole approximately seventy (70) motor vehicles in the Denver metropolitan area.

5. During all times relevant to this Indictment, enterprise members including, but not limited to, Miriam Alvarez, Alan Lopez-Reyes, Pedro Marrufo-Garcia, Robert Mills, Uriel Ureno-Garcia, [REDACTED]

[REDACTED] and other persons known or unknown to the Grand Jury, possessed, used, traded, purchased, transferred, sold, or disposed of stolen motor vehicles.

6. Enterprise members quickly used identification documents and financial transaction devices stolen from motor vehicles to make, or attempt to make, unauthorized cash withdrawals and purchases of gift cards, clothes, food, electronic devices, and other items.

7. During all times relevant to this Indictment, one or more enterprise members would steal motor vehicles, which would then be used to commit other crimes including, but not limited to, identity theft, vehicle trespass, theft, and additional motor vehicle thefts. Enterprise members often attached stolen and / or unauthorized license plates on the stolen vehicles.

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

9. At all times relevant to this Indictment, enterprise members obtained controlled substances including, but not limited to, heroin and methamphetamine, from Alan Lopez-Reyes, Robert Mills and Uriel Ureno-Garcia, and other dealers unknown to the Grand Jury.

10. At all times relevant to this Indictment, members of the enterprise shared controlled substances, stolen automobiles, transportation, stolen property, stolen identification documents, stolen financial transaction devices, money, proceeds from the sale or trade of stolen property, food, and living quarters to accomplish the enterprise's goals.

11. At all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$1,200,000.00 worth of motor vehicles and other property.

12. As to Predicate Act 32, on April 5, 2018, Miriam Alvarez pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S., in Denver District Court Case Number 2018CR980. Miriam Alvarez was sentenced in that case on April 5, 2018.

13. As to Predicate Act 33, on June 29, 2018, Miriam Alvarez pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S., in Arapahoe County District Court Case Number 2018CR977. Miriam Alvarez was sentenced in that case on June 29, 2018.

14. As to Predicate Act 34, on November 7, 2019, Uriel Ureno-Garcia pled guilty to one count of Possession With Intent to Manufacture or Distribute a Controlled Substance - Schedule



I or II; in violation of section 18-18-405(1),(2)(C)(I) C.R.S., in Denver District Court Case Number 2018CR2978. Uriel Ureno-Garcia was sentenced in that case on November 7, 2019.

15. As to Predicate Act 35, on November 26, 2018, Pedro Marrufo-Garcia pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was more than twenty thousand dollars; in violation of section 18-4-409(4)(a) C.R.S., in Arapahoe County District Court Case Number 2018CR2214. Pedro Marrufo-Garcia was sentenced in that case on November 26, 2018.

16. As to Predicate Act 36, on September 26, 2019, Alan Lopez-Reyes pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S., in Broomfield County District Court Case Number 2019CR155. Alan Lopez-Reyes was sentenced in that case on September 26, 2019.

17. As to Predicate 37, on November 7, 2019, Uriel Ureno-Garcia pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree 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., in Denver District Court Case Number 2019CR6750. Uriel Ureno-Garcia was sentenced in that case on November 7, 2019.

18. As to Predicate Act 38, on December 12, 2019, Pedro Marrufo-Garcia pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S., in Denver District Court Case Number 2019CR3642. Pedro Marrufo-Garcia was sentenced in that case on December 12, 2019.

19. As to Predicate Act 39, on January 27, 2020, Robert Mills pled guilty to one count of Criminal Attempt to Commit Robbery in violation of 18-4-301(1);18-2-101, C.R.S., in Denver District Court Case Number 2019CR7674. Robert Mills was sentenced in that case on March 16, 2020.

20. As to Predicate Act 40, on November 11, 2019, Robert Mills pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was less than one thousand dollars; in violation of section 18-4-409(4)(c), C.R.S., in Adams County District Court Case Number 2019CR3023. Robert Mills was sentenced in that case on November 11, 2019.

21. As to Predicate Act 41, on January 27, 2020, Robert Mills pled guilty to one count of Possession With Intent to Manufacture or Distribute a Controlled Substance - Schedule I or II; in violation of section 18-18-405(1),(2)(C)(I) C.R.S., in Denver District Court Case Number 2019CR6230. Robert Mills was sentenced in that case on March 16, 2020.

22. As to Predicate Act 42, on February 18, 2020, Miriam Alvarez pled guilty to one count of Aggravated Motor Vehicle Theft in the First Degree and the value of the vehicle was between \$20,000 and \$100,000, in violation of section 18-4-409(2),(3)(A.5), C.R.S., in Adams County

District Court Case Number 2019CR5075. Miriam Alvarez was sentenced in that case on April 14, 2020.

23. As to Predicate Act 43, on February 24, 2020, Pedro Marrufo-Garcia pled guilty to one count of Aggravated Motor Vehicle Theft in the Second Degree and the value of the motor vehicle was more than twenty thousand dollars; in violation of section 18-4-409(4)(a) C.R.S., in Arapahoe County District Court Case Number 2020CR27. Pedro Marrufo-Garcia was sentenced in that case on February 24, 2020.

**COUNT THREE**

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

Between and including **August 23, 2018 and September 28, 2018**, at or triable in the City and County of Denver, State of Colorado, **PEDRO MARRUFO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Count 3 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 23, 2018, [REDACTED] ([REDACTED]) parked his black 2008 Ford F250 truck at the RTD parking lot located at 6045 Richfield Street in the City and County of Denver, Colorado. Between August 23, 2018 and September 18, 2018, an as-yet unidentified enterprise member or members stole [REDACTED]'s truck. [REDACTED] discovered the theft on September 18, 2018. [REDACTED]'s Smith and Wesson .38 caliber pistol, which was in the truck, also was stolen.
3. The value of the stolen vehicle was approximately \$7,354.00.
4. On or about September 28, 2018, Lakewood Police Officers contacted Pedro Marrufo-Garcia (Marrufo-Garcia) inside [REDACTED]'s stolen F250 at the Crossland Economy Suites motel parking lot located at 715 North Kipling Street in Lakewood, Jefferson County, Colorado. The stolen pistol was not recovered.
5. Between and including August 23, 2018 and September 28, 2018, Marrufo-Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Ford F250 without the owner's authorization.

**COUNT FOUR**

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

On or about **November 1, 2018**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II), C.R.S.

The facts supporting Count 4 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 1, 2018, Denver Police Officers contacted Alan Lopez-Reyes (Lopez-Reyes) in the 800 block of North Knox Court in Denver, Colorado. At that time, Lopez-Reyes unlawfully, feloniously, and knowingly possessed a baggie containing 5.322 grams of Methamphetamine, a Schedule II Controlled substance. Lopez-Reyes also possessed a digital scale, which is commonly used for the distribution of controlled substances.

### COUNT FIVE

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

Between and including **January 7, 2019 and February 10, 2019**, at or triable in the City and County of Denver, State of Colorado, **URIEL URENO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Count 5 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 7, 2019, [REDACTED] ([REDACTED]) parked his blue 2013 GMC Terrain S.U.V. in front of his residence located in the 400 block of S. Kearney Street in Denver, Colorado. Durgin left the Terrain running with the keys in the ignition and briefly went inside his house. At that time, an as-yet unidentified enterprise member or members stole [REDACTED]'s Terrain.
3. The value of the stolen vehicle was approximately \$12,350.00.
4. On or about February 10, 2019, Aurora Police Officers recovered [REDACTED]'s stolen Terrain at 14 [REDACTED] East 24<sup>th</sup> Avenue in Aurora, Colorado. The Terrain had extensive damage. Stolen property from other vehicle thefts and trespasses was recovered inside the Terrain, as well as evidence that led to the discovery of surveillance video showing Uriel Ureno-Garcia (Ureno-Garcia) and [REDACTED] using the Terrain on or about February 8, 2019.
5. Between and including January 7, 2019 and February 10, 2019, Ureno-Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen GMC Terrain without the owner's authorization.

### COUNT SIX

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - WITH TWO OR MORE PRIORS, 18-4-409(2),(3)(b) C.R.S. (F3) <08043>

Between and including **March 16, 2019 and April 24, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ** unlawfully, feloniously, and knowingly obtained or exercised control over **A 2019 FORD EXPEDITION OF AVIS/BUDGET RENTAL**, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours. Further, on **APRIL 5, 2018** defendant was convicted of an offense involving theft of a motor vehicle in **DENVER DISTRICT COURT**, in case number **2018CR980**, and on **JUNE 29, 2018** defendant was convicted of an offense involving theft of a motor vehicle, in **ARAPAHOE COUNTY DISTRICT COURT**, in case number **2018CR977**; in violation of section 18-4-409(2),(3)(b), C.R.S.

### COUNT SEVEN

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

Between and including **March 16, 2019 and April 24, 2019**, at or triable in the City and County of Denver, State of Colorado, **PEDRO MARRUFO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over **A 2019 FORD EXPEDITION OF AVIS/BUDGET RENTAL**, 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 Counts 6 and 7 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On April 5, 2018, Miriam Alvarez (Alvarez) was convicted of an offense involving theft of a motor vehicle in Denver District Court, in case number 2018CR980.
3. On June 29, 2018, Alvarez was convicted of an offense involving theft of a motor vehicle, in Arapahoe County District Court, in case number 2018CR977.
4. Between and including March 16, 2019 and March 22, 2019, an as-yet unidentified enterprise member or members stole a white 2019 Ford Expedition SUV from Avis / Budget Rental. That vehicle was stolen from the Avis / Budget car rental lot located at 25500 East 78th Avenue in Denver, Colorado, at DIA.
5. The value of the stolen Expedition was approximately \$50,000.00.

6. On April 24, 2019, Colorado Metropolitan Auto Theft Task Force (CMATT) agents located and recovered the stolen Expedition in the 4700 block of St. Paul Street in Denver, Colorado, near an identified enterprise member's residence. That enterprise member admitted to CMATT agents that s/he had been driving it on a regular basis, and that Alvarez and Marrufo-Garcia stole it from DIA and had been using it before passing it on to her / him.

7. A cell phone stolen from [REDACTED] on or about April 7, 2019, was used by Alvarez and Marrufo-Garcia to video record themselves driving and using the stolen Expedition on or about April 14, 2019, in the City and County of Denver.

8. Between and including March 16, 2019 and April 24, 2019, Alvarez and Marrufo-Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over Avis / Budget's stolen Expedition without the owner's authorization.

**COUNT EIGHT**

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

Between and including **April 8, 2019 and April 9, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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 NINE**

INTRODUCING CONTRABAND IN THE FIRST DEGREE, 18-8-203(1)(a) C.R.S. (F4) <23041>

On or about **April 10, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly introduced or attempted to introduce a controlled substance, namely: **METHAMPHETAMINE**, into **DENVER DETENTION FACILITY**, a detention facility; in violation of section 18-8-203(1)(a), C.R.S.

The facts supporting Counts 8 and 9 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about April 8, 2019, Lopez-Reyes, in association with the enterprise, stole a white 2001 Ford F350 truck from [REDACTED]. That vehicle was stolen from the 1300 block of North Dallas Street in Aurora, Colorado.
3. The value of the stolen vehicle was approximately \$7,850.00.
4. On April 9, 2019, Denver Police Officers contacted Lopez-Reyes and [REDACTED] in [REDACTED] stolen Ford F350 at a Home Depot and Dollar Store parking lot located at 3100 S. Sheridan Boulevard in Denver, Colorado. The vehicle's ignition had been punched.
5. Between and including April 8, 2019 and April 9, 2019, Lopez-Reyes, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Ford F350 without the owner's authorization.
6. On April 10, 2019, Lopez-Reyes was booked into the Denver Detention Facility (DDF) located at 490 West Colfax Avenue in Denver, Colorado, on charges related to the theft of [REDACTED]'s Ford F350. Lopez-Reyes unlawfully, feloniously, and knowingly introduced or attempted to introduce a plastic baggie containing 0.858 grams of methamphetamine, a Schedule II controlled substance, into the detention facility. Sheriff's Deputies found the methamphetamine while searching Lopez-Reyes in a secured area on the second floor of the DDF.



**COUNT TEN**

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

Between and including **May 8, 2019 and May 14, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

**COUNT ELEVEN**

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

Between and including **May 8, 2019 and May 14, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Counts 10 and 11 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 8, 2019, an as-yet unidentified enterprise member or members stole a tan 2001 Chevrolet Tahoe S.U.V. from [REDACTED] ([REDACTED]). That vehicle was stolen from 2 [REDACTED] West 76th Avenue in Adams County, Colorado.
3. The value of the stolen Tahoe was approximately \$4,825.00.
4. On or about May 8, 2019, an as-yet unidentified enterprise member or members stole a black 2001 Ford F250 truck from [REDACTED] ([REDACTED]). That vehicle was stolen from 36 [REDACTED] East 41st Avenue in Denver, Colorado.
5. The value of the stolen F250 was approximately \$5,575.00.
6. On May 14, 2019, Denver Police Officers and CMATT agents contacted Lopez-Reyes and [REDACTED] working on [REDACTED]'s stolen F250 and [REDACTED]'s stolen Chevrolet Tahoe in the driveway of a residence located at 660 South Monaco Parkway in Denver, Colorado. Both vehicle's ignitions had been punched.
7. Lopez-Reyes admitted that he was parting out the vehicles for other members of the enterprise.

8. Between and including May 8, 2019 and May 14, 2019, Lopez-Reyes, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Ford F250 and [REDACTED]'s stolen Chevrolet Tahoe without the owners' authorization.

**COUNT TWELVE**

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

On or about **August 25, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ and PEDRO MARRUFO-GARCIA** 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 THIRTEEN**

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

On or about **August 25, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ and PEDRO MARRUFO-GARCIA** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

**COUNT FOURTEEN**

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - WITH TWO OR MORE PRIORS, 18-4-409(2),(3)(b) C.R.S. (F3) <08043>

Between and including **August 28, 2019 and August 29, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle. Further, on **APRIL 5, 2018** defendant was convicted of an offense involving theft of a motor vehicle in **DENVER DISTRICT COURT**, in case number **2018CR980** and on **JUNE 29, 2018** defendant was convicted of an offense involving theft of a motor vehicle, in **ARAPAHOE COUNTY DISTRICT COURT**, in case number **2018CR977**; in violation of section 18-4-409(2),(3)(b), C.R.S.

**COUNT FIFTEEN**

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

Between and including **August 28, 2019 and August 29, 2019**, at or triable in the City and County of Denver, State of Colorado, **PEDRO MARRUFO-GARCIA and ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

**COUNT SIXTEEN**

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

On or about **August 29, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ, PEDRO MARRUFO-GARCIA, and ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of **A 2019 JEEP GRAND CHEROKEE of OVERLAND WEST, INC**, 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 SEVENTEEN**

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

On or about **August 29, 2019**, at or triable in the City and County of Denver, State of Colorado, by engaging in conduct constituting a substantial step toward the commission of aggravated motor vehicle theft in the second degree, **MIRIAM ALVAREZ, PEDRO MARRUFO-GARCIA, and ROBERT MILLS** unlawfully, feloniously, and knowingly attempted to obtain or exercise control over the motor vehicle of [REDACTED], without authorization or by threat or deception, and the value of the motor vehicles was one thousand dollars or more but less than twenty thousand dollars; in violation of sections 18-4-409(4)(b) and 18-2-101, C.R.S.

**COUNT EIGHTEEN**

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

On or about **August 29, 2019**, at or triable in the City and County of Denver, State of Colorado, **MIRIAM ALVAREZ, PEDRO MARRUFO-GARCIA, and ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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.

The facts supporting Counts 12 through 18 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On April 5, 2018, Miriam Alvarez (Alvarez) was convicted of an offense involving theft of a motor vehicle in Denver District Court, in case number 2018CR980.
3. On June 29, 2018, Alvarez was convicted of an offense involving theft of a motor vehicle, in Arapahoe County District Court, in case number 2018CR977.

4. On or about August 25, 2019, Alvarez and Marrufo-Garcia, acting together and in association with the enterprise, unlawfully, feloniously, and knowingly broke entry into the motor vehicle of [REDACTED] ([REDACTED]) with intent to commit therein the crime of theft. [REDACTED]'s vehicle, a brown 2017 Toyota sedan, was parked in the lot of the dog park located at 10501 Simms Street in Westminster, Jefferson County, Colorado when Alvarez and Marrufo-Garcia entered it unlawfully and stole an iPhone, wallet, cash, personal and financial identifying documents and information belonging to [REDACTED]. The value of the stolen items was approximately \$1,000.00. The value of the damage to the vehicle was approximately \$500.00.

5. On or about August 25, 2019, immediately after breaking into [REDACTED]'s vehicle, Alvarez and Marrufo-Garcia unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial devices of [REDACTED], without permission or lawful authority, to purchase items in the amount of \$80.95 at the King Soopers store located at 9983 Wadsworth Parkway in Westminster, Colorado. Alvarez and Marrufo-Garcia then attempted to purchase additional items at the same store. Those transactions were captured on surveillance video. Alvarez's left thumb print was found on one of the packages she left at King Soopers after unsuccessfully attempting to purchase the item.

6. One of the cards used in some of the unsuccessful attempts was [REDACTED]'s [REDACTED] credit card.

7. On or about August 28, 2019, an as-yet unidentified enterprise member or members stole a silver 2006 Chevrolet Silverado truck from [REDACTED] ([REDACTED]). That vehicle was stolen from the parking lot of the Residence Inn located at 7050 W. Hampden Avenue in Lakewood, Jefferson County, Colorado.

8. The value of [REDACTED]'s stolen Silverado was approximately \$11,650.00.

9. On or about August 29, 2019, Alvarez, Marrufo-Garcia, and Robert Mills (Mills), acting together and in association with the enterprise, took [REDACTED]'s stolen Silverado to the Hertz rental lot located at DIA at 24890 East 78<sup>th</sup> Avenue in Denver, Colorado. There, Mills stole a 2019 Jeep valued at \$42,950.00 from Overland West, Inc. Mills followed Alvarez and Marrufo-Garcia, who were still in [REDACTED]'s stolen Silverado, out of the Hertz rental lot and past the secured gate.

10. Mills, driving the stolen Jeep, followed Alvarez and Marrufo-Garcia to the DIA Holiday Inn and Suites hotel parking lot located at 6900 North Tower Road in Denver, Colorado. Mills parked the stolen Jeep and re-entered [REDACTED]'s stolen Silverado.

11. Alvarez, Marrufo-Garcia, and Mills, acting together and in association with the enterprise, then took [REDACTED]'s stolen Silverado to the DIA AmericInn hotel parking lot located at 7010 North Tower Road in Denver, Colorado. Marrufo-Garcia then broke into [REDACTED] green 2001 Chevrolet Silverado 2500 truck and attempted to steal it, breaking the driver's side door lock, ignition lock, and steering column. A marked Denver Police Department patrol car drove into the AmericInn parking lot and Marrufo-Garcia fled [REDACTED]'s truck. Marrufo-Garcia re-

entered [REDACTED]'s stolen Silverado. Alvarez, Marrufo-Garcia, and Mills fled in [REDACTED]'s Silverado. The value of [REDACTED]'s Silverado was approximately \$5,675.00.

12. Alvarez, Marrufo-Garcia, and Mills, acting together and in association with the enterprise, then took [REDACTED]'s stolen Silverado to the [REDACTED] Apartments complex parking lot located at 16 [REDACTED] Green Valley Ranch Boulevard in Denver, Colorado. One of the males (either Marrufo-Garcia or Mills) stole [REDACTED]' white 2002 Dodge Ram truck, valued at \$5,200.00, from the [REDACTED] apartment complex parking lot. Both stolen trucks left the parking lot together and proceeded to 53<sup>rd</sup> Avenue and Chambers Road in Denver, where the occupant of the stolen Ram abandoned the Ram, re-entered [REDACTED]'s stolen Silverado, and fled.

13. Alvarez, Marrufo-Garcia, and Mills took [REDACTED]'s stolen Silverado to a neighborhood in the area of Martin Luther King Boulevard and Quebec Street in Denver. There, CMATT agents saw one of the occupants of [REDACTED]'s stolen Silverado get into a maroon Ford F250 that had a stolen license plate attached. The F250 and [REDACTED]'s stolen Silverado travelled together to the 7900 block of Niagara Street in Commerce City, Adams County, Colorado.

14. CMATT agents and officers in marked patrol cars attempted to apprehend Alvarez, Marrufo-Garcia and Mills, but the occupants of [REDACTED]'s Silverado abandoned that truck, entered the maroon F250, and fled the scene recklessly and at high speed.

15. During the afternoon of August 29, 2019, CMATT agents and other police officers recovered [REDACTED]'s stolen Silverado, Overland West's stolen Jeep, and [REDACTED]'s stolen Ram.

16. An enterprise member or members had attached an unauthorized Colorado temporary license plate, number [REDACTED], to [REDACTED]'s stolen Silverado to disguise the fact that it was a stolen vehicle.

17. Ms. [REDACTED]'s stolen [REDACTED] credit card was among other stolen property recovered in [REDACTED]'s stolen Silverado.

**COUNT NINETEEN**

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

On or about **August 28, 2019**, at or triable in the City and County of Denver, State of Colorado, **URIEL URENO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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**

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

On or about **August 28, 2019**, at or triable in the City and County of Denver, State of Colorado, **URIEL URENO-GARCIA** 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).

The facts supporting Counts 19 and 20 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 27, 2019, an as-yet unidentified enterprise member or members stole a white 2001 Ford F250 truck from [REDACTED] ([REDACTED]). That vehicle was stolen from 14 [REDACTED] South Eliot Street in Denver, Colorado.
3. The value of the stolen F250 was approximately \$4,725.00.
4. On August 28, 2019, CMATT agents observed Uriel Ureno-Garcia (Ureno-Garcia) driving [REDACTED]'s stolen F250 in and around the area of 262 South Jasper Circle in Aurora, Colorado. Ureno-Garcia, [REDACTED], [REDACTED] and [REDACTED], acting together and in association with the enterprise, used Mendoza-Jaramillo's stolen F250 to go to and from various locations until arrested by CMATT agents.
5. When he was arrested on August 28, 2019, Ureno-Garcia unlawfully, feloniously, and knowingly possessed a baggie containing 3.54 grams of Methamphetamine, a Schedule II Controlled substance.
6. On or about August 28, 2019, Ureno-Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Ford F250 without the owner's authorization.

**COUNT TWENTY-ONE**

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

On or about **August 30, 2019**, at or triable in the City and County of Denver, State of Colorado, **ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of **A 2018 FORD EXPLORER of HERTZ**, 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 TWENTY-TWO**

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

On or about **August 30, 2019**, at or triable in the City and County of Denver, State of Colorado, **ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of **A 2019 MERCEDES SPORT UTILITY VEHICLE of HERTZ**, 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.

The facts supporting Counts 21 and 22 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 30, 2019, Robert Mills (Mills), [REDACTED] ([REDACTED]) and an as-yet unidentified enterprise member, acting together and in association with the enterprise, drove a 2001 Mustang to the Hertz rental lot located at DIA at 24890 East 78<sup>th</sup> Avenue in Denver, Colorado.
3. Mills stole a 2018 Ford Explorer valued at \$32,075.00 from Hertz.
4. The as-yet unidentified enterprise member stole a 2019 Mercedes S.U.V valued at \$50,000.00 from Hertz.
5. [REDACTED] stayed with and drove the 2001 Mustang.
6. Mills, [REDACTED] and the unidentified enterprise member, each in their respective vehicle, were stopped by Hertz personnel at the security gate when Mills, Gunning, and the enterprise member tried to exit.
7. The enterprise member drove the stolen Mercedes through an entrance-only gate over “tiger teeth” barrier spikes, causing the four tires to deflate. The unidentified enterprise member continued to flee in the Mercedes. The unidentified enterprise member abandoned the now-damaged Mercedes at Pena Boulevard and Tower Road.



8. Mills abandoned the stolen Explorer and got into the Mustang that [REDACTED] was driving. [REDACTED] and Mills attempted to flee in the Mustang at high speed through a closed exit gate, but collided with a raised steel barrier. [REDACTED] and Mills abandoned the damaged Mustang and fled on foot.

**COUNT TWENTY-THREE**

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

Between and including **September 11, 2019 and September 13, 2019**, at or triable in the City and County of Denver, State of Colorado, **ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The facts supporting Count 23 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 11, 2019, an as-yet unidentified enterprise member or members stole a tan 2004 Chevrolet Tahoe S.U.V. from [REDACTED] ([REDACTED]). That vehicle was stolen from 74 [REDACTED] East Hampden Avenue in Denver, Colorado.
3. The value of the stolen Tahoe was approximately \$6,025.00.
4. On September 13, 2019, Aurora Police Department officers observed Mills and [REDACTED] ([REDACTED]) using [REDACTED]'s stolen Tahoe in and around the area of 26 S. Sable Street in Aurora, Colorado. Mills and [REDACTED], acting together and in association with the enterprise, used [REDACTED]'s stolen Tahoe to go to and from various locations. Mills was driving and [REDACTED] was a passenger. Mills spotted Aurora police vehicles and fled at high speed before crashing the Tahoe. Mills and [REDACTED] were arrested by Aurora Police officers on September 13, 2019.
5. An enterprise member or members had attached an unauthorized Colorado license plate, number [REDACTED], to S [REDACTED]'s stolen Tahoe to disguise the fact that it was a stolen vehicle.
6. Between and including September 11, 2019 and September 13, 2019, Mills, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Chevrolet Tahoe without the owner's authorization.

**COUNT TWENTY-FOUR**

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

On or about **December 3, 2019**, at or triable in the City and County of Denver, State of Colorado, **ROBERT MILLS** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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-FIVE**

RECKLESS DRIVING, C.R.S. 42-4-1401 (T2) < 73301>

On or about **December 3, 2019**, at or triable in the City and County of Denver, State of Colorado, **ROBERT MILLS** unlawfully drove a motor vehicle or low-power scooter in such a manner as to indicate a wanton or willful disregard for the safety of persons or property; in violation of section 42-4-1401, C.R.S.

The facts supporting Counts 24 and 25 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 30, 2019, an as-yet unidentified enterprise member or members stole a white 2007 GMC Sierra 3500 truck from [REDACTED] ([REDACTED]). That vehicle was stolen from the parking lot of the Radisson Hotel located at 3155 S. Vaugh Way in Aurora, Colorado.
3. The value of the stolen Sierra 3500 was approximately \$13,950.00.
4. On December 2, 2019, Mills bonded out of Arapahoe County jail.
5. On December 3, 2019, at approximately 2:00 AM, Arapahoe County Sheriff Deputy Gutierrez observed Mills driving [REDACTED]'s stolen Sierra 3500 in the area of S. Parker Road and East Mississippi Avenue in Arapahoe County, Colorado. Mills was following a blue pick-up truck that ran a stoplight at that intersection, as did Mills. The blue truck fled recklessly at a high rate of speed. Deputy Gutierrez attempted to stop Mills, but Mills turned off the truck lights and sped through a red light at S. Willow Street and East Florida Avenue. Mills parked in a lot located at 9100 East Florida Avenue and was taken into custody.
6. Deputies saw that the stolen truck's door lock and ignition had been punched. Mills stated he received the truck from an associate whom Mills declined to identify.

**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 **December 24, 2019 and December 30, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

**COUNT TWENTY-SEVEN**

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

On or about **December 30, 2019**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly entered the motor vehicle of [REDACTED] with intent to commit therein the crime of **THEFT**; in violation of section 18-4-502, C.R.S.

**COUNT TWENTY-EIGHT**

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

Between and including **December 30, 2019 and January 2, 2020**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES and URIEL URENO-GARCIA** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was 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 TWENTY-NINE**

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

On or about **January 2, 2020**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle 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 THIRTY**

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

Between and including **January 2, 2020 and January 3, 2020**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was 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 THIRTY-ONE**

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

On or about **January 3, 2020**, at or triable in the City and County of Denver, State of Colorado, **ALAN LOPEZ-REYES** 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).

The facts supporting Counts 26 through 31 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 24, 2019, Alan Lopez-Reyes (Lopez-Reyes), in association with the enterprise, stole a white 2005 Ford F350 from [REDACTED] ([REDACTED]). That vehicle was stolen from 1 [REDACTED] East 88th Avenue in Thornton, Adams County, Colorado.
3. The value of [REDACTED]'s stolen F350 was approximately \$11,275.00.
4. On or about December 30, 2019, Lopez-Reyes, in association with the enterprise, abandoned [REDACTED]'s stolen F350 in a parking lot located at 25101 County Road 35, Yuma County, Colorado. Lopez-Reyes then stole a black 2019 Ram 1500 owned by [REDACTED] from that same parking lot.
5. The value of [REDACTED]'s stolen Ram 1500 was approximately \$49,685.00.
6. After stealing [REDACTED]'s Ram 1500, Lopez-Reyes stopped in the same lot located at 25101 County Road 35, Yuma County, Colorado and unlawfully entered a blue Chevrolet 1500 truck owned by [REDACTED]. Lopez-Reyes stole [REDACTED]'s wallet from the Chevrolet truck and fled the scene in [REDACTED]'s stolen Ram 1500.

7. On or about January 2, 2020, Lopez-Reyes, Uriel Ureno-Garcia (Ureno-Garcia) and [REDACTED] ([REDACTED]), acting together and in association with the enterprise, used [REDACTED]'s stolen Ram 1500 to go to and from various locations. Lopez-Reyes was driving and Ureno-Garcia and [REDACTED] were passengers. Ureno-Garcia and [REDACTED] knew that Lopez-Reyes had stolen the truck. A Colorado State Patrol (CSP) Trooper attempted to stop Lopez-Reyes, Ureno-Garcia and [REDACTED] in [REDACTED]'s stolen Ram 1500, but they fled recklessly and at a high rate of speed. CSP did not pursue.

8. On or about January 2, 2020, Lopez-Reyes, Ureno-Garcia and [REDACTED] abandoned [REDACTED]'s stolen Ram 1500 in the parking lot of [REDACTED] located at 3 [REDACTED] East 1<sup>st</sup> Street in Akron, Washington County, Colorado. Ureno-Garcia was arrested in Akron shortly thereafter.

9. Between and including December 30, 2019 and January 2, 2020, Lopez-Ryes and Ureno-Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly retained possession or control over [REDACTED]'s stolen Ram 1500 without the owner's authorization.

10. On or about January 2, 2020, Lopez-Reyes and [REDACTED] stole two trucks and used those stolen trucks to flee Akron. Lopez-Reyes and [REDACTED] acting together and in association with the enterprise, stole a black 2005 GMC Sierra owned by [REDACTED] that was valued at approximately \$10,425.00, and a blue 2014 GMC Sierra owned by [REDACTED] that was valued at approximately \$28,075.00. Lopez-Reyes and [REDACTED] stole both GMC trucks from a parking lot located at 250 Main Avenue in Akron, Washington County, Colorado.

11. On or about January 2, 2020, Lopez-Reyes drove [REDACTED]'s stolen GMC and [REDACTED] drove [REDACTED]'s GMC as they fled Akron. Lopez-Reyes and [REDACTED] were pursued by a Washington County Sheriff's deputy until [REDACTED] was stopped on Interstate 76 in Morgan County, Colorado. Lopez-Reyes continued to flee and was not caught at that time.

12. On or about January 3, 2020, Lopez-Reyes and Pedro Marrufo-Garcia (Marrufo-Garcia), acting together and in association with the enterprise, used [REDACTED]'s stolen GMC truck to go to and from various locations. Lopez-Reyes and Marrufo-Garcia each drove [REDACTED]'s stolen truck at different times. Lopez-Reyes was driving and Marrufo-Garcia was a passenger in [REDACTED]'s stolen GMC truck when they were stopped and arrested by CMATT agents and Aurora Police Officers on January 3, 2020.

13. When he was arrested on January 3, 2020, Lopez-Reyes was in possession of financial transaction devices that he had stolen from [REDACTED]'s and [REDACTED]'s trucks.

14. When he was arrested on January 3, 2020, Lopez-Reyes unlawfully, feloniously and knowingly possessed a baggie containing 5.3 grams of Methamphetamine, a Schedule II Controlled substance.

15. As noted in the facts supporting Predicate Act 43, on February 24, 2020, Marrufo-Garcia pled guilty to the theft of [REDACTED]'s truck in Arapahoe County District Court Case Number 2020CR27.