

District Court, City and County of Denver, Colorado City and County Building, Room 424 1437 Bannock Street Denver, CO 80202	<div style="text-align: center;">COURT USE ONLY</div>
Plaintiff: THE PEOPLE OF THE STATE OF COLORADO Defendant(s): Sergio Casimiro-Mejia Susana Garcia Olivia I Talamantes Jonathan G Valdivia III Fabian E Varela-Castillo Jonathan E Baeza Delgado Karina Carbajal Dianna Laura Gaucin Esequiel Gomez Felix Lopez Debbie Rachel Valdivia	
INDICTMENT	

VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3), (F2) <37284> 1, 2 (2 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, C.R.S. 18-4-409(2),(3)(a), (F5) <0804G> 3, 7, 10, 13, 26, 27, 28, 29, 33, 34, 40, 45, 46, 54, 65, 72, 75 (17 counts)

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, C.R.S. 18-12-108(1),(2)(c), (F5) <30078> 11 (1 count)

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, C.R.S. 18-12-108(1), (F6) <3007A> 4, 5, 12, 15, 16, 23, 51, 62, 63, 64 (10 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(4)(b), (F6) <0804E> 6, 31, 36, 38, 41 (5 counts)

SPECIAL OFFENDER, C.R.S. 18-18-407(1)(d)(II), (DF1) <33A46> 8, 17, 52 (3 counts)

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE, C.R.S. 18-18-405(1),(2)(b)(I)(B), (DF2) <8104A> 9, 19, 44 (3 counts)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - WITH TWO OR MORE PRIORS, C.R.S. 18-4-409(2),(3)(b), (F3) <08043> 14, 21, 61, 74 (4 counts)

SPECIAL OFFENDER, C.R.S. 18-18-407(1)(d)(I), (DF1) <33A45> 18 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, C.R.S. 18-4-409(2),(3)(a.5), (F4) <0804H> 20, 22, 25 (3 counts)

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q> 24, 32, 35, 37, 39, 42 (6 counts)

IDENTITY THEFT, C.R.S. 18-5-902(1)(a), (F4) <1307G> 30 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(4)(a), (F5) <0804D> 43, 59, 65 (3 counts)

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (F4) <1307H> 47, 48, 49, 50, 55, 56 (6 counts)

UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE, C.R.S. 18-18-403.5(1),(2)(a), (DF4) < 8101D > 53 (1 count)

THEFT, C.R.S. 18-4-401(1),(2)(h), (F4) <08A15> 57 (1 count)

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1), (F4) <06031> 58, 66 (2 counts)

ASSAULT IN THE FIRST DEGREE, C.R.S. 18-3-202(1)(a), (F3) <02011> 68 (1 count)

ASSAULT IN THE FIRST DEGREE, C.R.S. 18-3-202(1)(c), (F3) <02015> 69 (1 count)

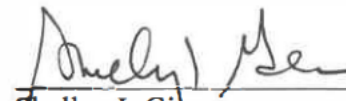
LEAVING THE SCENE OF AN ACCIDENT, C.R.S. 42-4-1601(1),(2)(b), (F4) <7314C> 70 (1 count)

VEHICULAR ASSAULT, C.R.S. 18-3-205(1)(a), (F5) <02041> 71 (1 count)

AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(4)(b), (F6) <0804K> 73 (1 count)

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

Dated this 11th day of May, 2022.



Shelley I. Gilman
~~Presiding Judge~~
Denver District Court

INDICTMENT

STATE OF COLORADO)
)
COUNTY OF DENVER)

Of the term of the District Court in the year 2021, the Grand Jurors chosen, selected and sworn in and for the County of Denver, in the name and by the authority of the People of the State of Colorado, upon their oaths, present their indictment of: **Sergio Casimiro-Mejia, Susana Garcia, Olivia I Talamantes, Jonathan G Valdivia III, Fabian E Varela-Castillo, Jonathan E Baeza Delgado, Karina Carbajal, Dianna Laura Gaucin, Esequiel Gomez, Felix Lopez, Debbie Rachel Valdivia**, for the following described acts, committed, or triable, in the County of Denver, all done contrary to the form of the statutes in such case made and provided, and against the peace and dignity of the People of the State of Colorado, as stated in the counts attached hereto.

Dated this 11 day of May, 2022.

AS TO COUNT ONE:
(cocca-pattern of racketeering)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWO:
(cocca-pattern of racketeering)

TRUE BILL

NO TRUE BILL

AS TO COUNT THREE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT FOUR:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIVE:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIX:
(motor vehicle theft/agg 2-\$1000-\$20,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVEN:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHT:
(controlled subs-special off-firearm)

TRUE BILL

NO TRUE BILL

AS TO COUNT NINE:
(controlled sub-poss w/int m/h/k/c 7-112g)

TRUE BILL

NO TRUE BILL

AS TO COUNT TEN:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT ELEVEN:
(weapon-poss/prev offender-burg/arson/for)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWELVE:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTEEN:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT FOURTEEN:
(motor vehicle theft/agg-w/two priors)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTEEN:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTEEN:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTEEN:
(controlled subs-special off-firearm)

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHTEEN:
(controlled subs-special off-deadly weap)

TRUE BILL

NO TRUE BILL

AS TO COUNT NINETEEN:
(controlled sub-poss w/int m/h/k/c 7-112g)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY:
(motor vehicle theft/agg 1 20k-100k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-ONE:
(motor vehicle theft/agg-w/two priors)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-TWO:
(motor vehicle theft/agg 1 20k-100k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-THREE:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-FOUR:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-FIVE:
(motor vehicle theft/agg 1 20k-100k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-SIX:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-SEVEN:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-EIGHT:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-NINE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY:
(id theft-uses info to obtain)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-ONE:
(motor vehicle theft/agg 2-\$1000-\$20,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-TWO:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-THREE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-FOUR:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-FIVE:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-SIX:
(motor vehicle theft/agg 2-\$1000-\$20,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-SEVEN:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-EIGHT:
(motor vehicle theft/agg 2-\$1000-\$20,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THIRTY-NINE:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-ONE:
(motor vehicle theft/agg 2-\$1000-\$20,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-TWO:
(cybercrime-commit theft-\$5k-\$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-THREE:
(motor vehicle theft/agg 2-over \$20,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-FOUR:
(controlled sub-poss w/int m/h/k/c 7-112g)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-FIVE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-SIX:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-SEVEN:
(id theft-poss w/ intent to use)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-EIGHT:
(id theft-poss w/ intent to use)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FORTY-NINE:
(id theft-poss w/ intent to use)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FIFTY:
(id theft-poss w/ intent to use)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FIFTY-ONE:
(weapon-poss/previous offend-any prior fe)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FIFTY-TWO:
(controlled subs-special off-firearm)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-THREE:
(controlled sub-poss w/int dist sch 1/2)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-FOUR:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-FIVE:
(id theft-poss w/ intent to use)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-SIX:
(id theft-poss w/ intent to use)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-SEVEN:
(theft-\$20,000-\$100,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-EIGHT:
(burglary 2-of building)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-NINE:
(motor vehicle theft/agg 2-over \$20,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY:
(motor vehicle theft/agg 2-over \$20,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-ONE:
(motor vehicle theft/agg-w/two priors)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-TWO:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-THREE:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-FOUR:
(weapon-poss/previous offend-any prior fe)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-FIVE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-SIX:
(burglary 2-of building)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-SEVEN:
(controlled sub-poss w/int dist-sch 1/2)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-EIGHT:
(assault 1-sbi w/ deadly weapon)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-NINE:
(assault 1-extreme indifference)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY:
(leaving scene/accident involving sbi)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-ONE:
(vehicular assault-reckless)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-TWO:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-THREE:
(motor vehicle theft/agg 2-\$2000-\$20,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-FOUR:
(motor vehicle theft/agg-w/two priors)

TRUE BILL _____

NO TRUE BILL _____

AS TO COUNT SEVENTY-FIVE:
(motor vehicle theft/agg 1-less \$20k)

TRUE BILL _____

NO TRUE BILL _____

I, _____, the Foreperson of the 2021 Denver County Statutory Grand Jury, do hereby swear and affirm that each and every True Bill returned in this Indictment by the 2021 Denver County Statutory Grand Jury, was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the 2021 Denver County Statutory Grand Jury. The 2021 Denver County Statutory Grand Jury, authorizes and instructs the Denver District Attorney to return this Indictment to open court with or without the presence of the Foreperson.

Foreperson

Subscribed and sworn to before me in the County of Denver, State of Colorado, this
11 day of May, 2022.


Notary Public

My commission expires:

6/16/2024

**NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19874087996
MY COMMISSION EXPIRES JUNE 16, 2024**

BETH McCANN
District Attorney

By: 
Danielle R Sexton, Reg. No. **42278**
Denver District Attorney's Office
201 W. Colfax Ave., Dept. 801
Denver, CO 80202
720-913-9015

COUNT ONE

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

Between and including February 04, 2021 and May 11, 2022, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA, SUSANA GARCIA, OLIVIA TALAMANTES, and FABIAN VARELA-CASTILLO, and a group of individuals associated in fact, though not a legal entity, including but not limited to, JONATHAN VALDIVIA, JONATHAN BAEZA-DELGADO, KARINA CARBAJAL, DIANNA GAUCIN, ESEQUIEL GOMEZ, FELIX LOPEZ, DEBBIE VALDIVIA, and other persons to the Grand Jury unknown, 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.

COUNT TWO

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

Between and including October 14, 2021 and May 11, 2022, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA, and a group of individuals associated in fact, though not a legal entity, including but not limited to, SERGIO CASIMIRO-MEJIA, SUSANA GARCIA, OLIVIA TALAMANTES, FABIAN VARELA-CASTILLO, JONATHAN BAEZA-DELGADO, KARINA CARBAJAL, DIANNA GAUCIN, ESEQUIEL GOMEZ, FELIX LOPEZ, and DEBBIE VALDIVIA, and other persons to the Grand Jury unknown, 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: SERGIO CASIMIRO-MEJIA, SUSANA GARCIA, OLIVIA TALAMANTES, FABIAN VARELA-CASTILLO, and JONATHAN VALDIVIA, and a group of individuals associated in fact, though not a legal entity, including but not limited to, JONATHAN BAEZA-DELGADO, KARINA CARBAJAL, DIANNA GAUCIN, ESEQUIEL GOMEZ, FELIX LOPEZ, DEBBIE VALDIVIA, and other persons to the Grand Jury unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

Pattern of Racketeering Activity

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

As to **Sergio Casimiro-Mejia**, the acts described in counts 7, 8, 9, 10, 13, 26, 27, 28, 29, 34, 40, 44, 45, 46, 47, 48, 49, 50, 67, including any lesser included offenses of these counts.

As to **Susana Garcia**, the acts described in counts 6, 24, 31, 32, 38, 39, 43, 68, 69, 71, 72, 73, including any lesser included offenses of these counts.

As to **Olivia I Talamantes**, the acts described in counts 13, 26, 27, 28, 29, 30, 33, 34, 40, 45, 46, 47, 48, 49, 50, 65, including any lesser included offenses of these counts.

As to **Jonathan G Valdivia III**, the acts described in counts 17, 18, 19, 20, 22, 24, 25, 36, 37, 41, 42, 52, 53, 54, 55, 56, 57, 75, including any lesser included offenses of these counts.

As to **Fabian E Varela-Castillo**, the acts described in counts 3, 17, 19, 21, 43, 61, 66, 74, including any lesser included offenses of these counts.

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 4, 2021 through May 11, 2022, with various members joining at various times, Sergio Casimiro-Mejia, Susana Garcia, Olivia Talamantes, Jonathan Valdivia, Fabian Varela-Castillo, and a group of individuals associated in fact, though not a legal entity, including but not limited to, Jonathan Baeza-Delgado, Karina Carbajal, Dianna Gaucin, Esequiel Gomez, Felix Lopez, and Debbie Valdivia, were a group of individuals associated in fact, though not a legal entity, with common goals.
3. The common goals of the enterprise were to: share, sell, distribute and use stolen motor vehicles; to share, distribute and use stolen money; to share, sell, distribute and use stolen firearms; and to share, sell, distribute and use stolen tools, stolen identification documents, stolen financial transaction devices, stolen merchandise, stolen electronic devices, and other stolen property; for the purpose of unlawfully obtaining, sharing, distributing, selling and using controlled substances, (primarily fentanyl, heroin, and methamphetamine), and to maintain their lifestyle.
4. Most members of the enterprise have familial or interpersonal relationships that predated and permeated the enterprise. Jonathan Valdivia and Debbie Valdivia are siblings. From time to time, Jonathan Valdivia was in intimate relationships with Susana Garcia and Dianna Gaucin. Debbie Valdivia was, and is, in an intimate relationship with Jonathan Baeza-Delgado. Sergio Casimiro-Mejia and Olivia Talamantes were in an intimate relationship.
5. Members of the enterprise obtained stolen property in Colorado primarily through stealing motor vehicles and by committing identity theft.
6. During all times relevant to this Indictment, enterprise members concentrated on stealing Kia and Hyundai sedans and sport utility vehicles (SUV), Dodge Chargers and Challengers, and full size Ford, Cadillac, Chevrolet and GMC trucks and SUVs, although not exclusively. Stolen

vehicles were called “whips” by enterprise members.

7. During all times relevant to this Indictment, enterprise members also concentrated on stealing camping trailers. Enterprise members used stolen camping trailers as their residences. Enterprise members sold, traded, or gave each other stolen camping trailers.

8. Enterprise members including, but not limited to, Casimiro-Mejia, Talamantes, Garcia, and the Valdivias developed a common method of stealing motor vehicles. Members would conduct reconnaissance in an area and identify potential target vehicles, choosing preferred makes, models and trim levels. Members usually operated in teams of at least two, with one driving and the other designated as the thief. That thief would gain entry, often by breaking a door lock, then break the ignition lock, causing more than \$500.00 worth of damage to each target vehicle. The thief would start the target vehicle with a flat head screwdriver or other implement and drive away, followed or led by the driver in the other vehicle. Members often concealed the damaged ignition and steering column by draping bandannas or medical masks over the ignition and column. Members often attached stolen and / or unauthorized license plates to conceal the stolen vehicles.

9. Another method used by enterprise members, (including, but not limited to, Fabian Varela-Castillo), to steal motor vehicles was to utilize electronic key programmers to defeat authorized key fobs and allow thieves to substitute after-market key fobs to operate the target vehicles.

10. Another method enterprise members, (including, but not limited to, Fabian Varela-Castillo and Felix Lopez), used to steal motor vehicles was to burglarize dealerships and / or repair shops. Once inside, enterprise members accessed customer, dealer, and client keys. Enterprise members then used those keys to steal multiple vehicles from the dealer and / or repair lots.

11. Enterprise members conducted counter-surveillance on law enforcement officers prior to and during criminal episodes, including, but not limited to, dangerous and / or unpredictable driving maneuvers designed to identify undercover officers and law enforcement vehicles. Enterprise members drove recklessly and without regard for the safety of themselves or others, even when no law enforcement officers were following or attempting to stop them. If confronted by law enforcement officers or theft victims, enterprise members engaged in reckless maneuvers, including, but not limited to, ramming vehicles, driving over obstacles, fleeing at high speed, and entering on-coming lanes of traffic.

12. As part of their scheme, members used social media platforms including, but not limited to, Facebook to communicate with one another. Members posted videos and sent audible and text messages to each other describing target vehicles, target vehicle locations, and stolen vehicle descriptions and locations. Members communicated through Facebook to arrange bond for other members. Members communicated through Facebook and other digital means while in the act of fleeing law enforcement officers, arranging on the fly to be picked up or hidden by other members.

13. Enterprise members sold stolen vehicles and other stolen property through a variety of methods including, but not limited to, face-to-face meetings arranged through a variety of social media platforms, including, but not limited to, Facebook. Members enjoyed sale prices on stolen vehicles, i.e., the price of a stolen vehicle was lower when sold or traded between members than when

a stolen vehicle was sold or traded to non-members.

14. During all times relevant to this Indictment, members resided at, and parked stolen vehicles and stolen trailers at or near, various locations in Colorado, including, but not limited to: the Valdivia's residence located at 3635 W. 13th Avenue in Denver; Casimiro-Mejia and Talamantes's residence located at 3485 W. Kentucky Avenue in Denver; Jonathan Baeza-Delgado's residence located at 781 S. Wolff Street in Denver; and the large undeveloped area known to the enterprise members as "The Ranch" or "Rancho" located at 7010 Manila Road in unincorporated Adams County.

15. Enterprise members quickly used identification documents and financial devices stolen from motor vehicles to make, or attempt to make, unauthorized purchases of tools, gift cards, clothing, food, and other items.

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

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

18. At all times relevant to this Indictment, members continued to commit crimes to support themselves and each other, even when one or more members were caught and briefly jailed. After being bonded from jail, the bonded members immediately began committing more crimes to support themselves and other members.

19. At all times relevant to this Indictment, property taken from dozens of stolen motor vehicles was recovered in the possession and control of enterprise members. That stolen property included, but was not limited to, stolen personal property, stolen personal identifying documents, stolen financial devices and information, stolen license plates. Also, key programmers in the possession and control of enterprise members contained Vehicle Identification Numbers (VINs) of stolen motor vehicles that had been stolen with reprogrammed keys.

20. Members of the enterprise, including, but not limited to, Casimiro-Mejia, Garcia, Talamantes, Jonathan Valdivia, Baeza-Delgado, Carbajal, Gaucin, and Gomez, working in concert with each other and/or with persons known and unknown to the Grand Jury, stole at least thirty vehicles in the Denver metropolitan area. The aggregate value of those stolen vehicles alone is more than \$700,000.00.

21. Based on property from other stolen vehicles recovered from enterprise members, the enterprise stole at least an additional one hundred vehicles, with an additional loss of more than \$2,300,000.00.

22. At all times relevant to this Indictment, members of the enterprise stole an aggregate amount of more than \$3,100,000.00 inclusive of motor vehicles and all other property.

COUNT THREE

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

On or about February 04, 2021, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 FOUR

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

On or about February 05, 2021, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 18-4-409(2),(3)(a) C.R.S., on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

COUNT FIVE

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

On or about February 05, 2021, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 18-4-409(2),(3)(a) C.R.S., on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 3, 4 and 5 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on February 3, 2021 and February 4, 2021, an as-yet unidentified enterprise member or members stole a silver 2016 Kia Optima from [REDACTED]. That vehicle was stolen from [REDACTED] S Quebec Way, City and County of Denver, Colorado. The value of the stolen vehicle was approximately \$16,250.00.

3. On February 5, 2021 at approximately 1:25 AM, Denver Police Officers arrested Fabian Varela-Castillo, who, in association with the enterprise, was in possession and control of [REDACTED] stolen Kia at 11780 E 53rd Avenue in Denver. The driver's side door handle and ignition of [REDACTED] Kia were broken. The damage was more than \$500.00.

4. Two loaded handguns that were recovered in the driver door panel next to Varela-Castillo. One handgun was a .44 Magnum Taurus, serial # [REDACTED], and the other was a Glock 19, serial # [REDACTED] with a 17 round high capacity magazine inserted.

5. Varela-Castillo possessed two firearms and was previously convicted on July 16, 2018 in Denver District Court Case #2017CR8939, for a felony, namely: Aggravated Motor Vehicle Theft In The First Degree.

COUNT SIX

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

On or about March 03, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA 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 Count 6 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on March 2, 2021 and March 3, 2021, an as-yet unidentified enterprise member or members broke entry into the [REDACTED] auto body repair shop located at [REDACTED] E. Louisiana Avenue, City and County of Denver, Colorado.
3. As-yet unidentified enterprise member or members stole a black 2018 Land Rover "Velar" SUV belonging to [REDACTED] from the [REDACTED] shop. The value of the stolen vehicle was approximately \$57,750.00.
4. Aurora Police Department officers recovered [REDACTED] stolen Land Rover on March 4, 2021, near 1950 N. Dallas Street in Aurora, Colorado.
5. The Land Rover was secured, towed, and processed. A latent fingerprint identified as Susana Garcia's was recovered from the center console / shifter area.

COUNT SEVEN

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

Between and including July 09, 2021 and July 12, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 7 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On July 8, 2021 between 6:00 AM and 7:15 PM, an as-yet unidentified enterprise member or members stole a white 2003 Chevy Silverado pick-up truck belonging to [REDACTED] from [REDACTED] N. Rifle Street in Aurora, Adams County, Colorado. The value of the stolen vehicle was approximately \$7,425.00. A Polaris "Predator" All Terrain Vehicle (ATV) valued at \$1,600.00 was in the truck bed at the time of the theft.
3. Denver Police Department officers recovered [REDACTED] stolen Silverado on July 12, 2021, in the alley behind 3485 W. Kentucky Avenue in Denver, Colorado. That location was the residence of Sergio Casimiro-Mejia and Olivia Talamantes. The vehicle had a damaged door lock and cracked steering column with damages exceeding \$500.00. The Polaris ATV was not recovered.
4. The Silverado was secured, towed, and processed. A latent fingerprint identified as that of Casimiro-Mejia's was recovered from the interior rear view mirror.

COUNT EIGHT

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

On or about July 22, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA committed the felony offense charged in count 9 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 NINE

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

On or about July 22, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA 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 TEN

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

Between and including July 21, 2021 and July 22, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 ELEVEN

POSSESSION OF A WEAPON BY PREVIOUS OFFENDER, C.R.S. 18-12-108(1),(2)(c), (F5) <30078>

On or about July 22, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM within ten years of his previous conviction or release from confinement or supervision on MARCH 19, 2018 in Denver District Court Case #2017CR6482 for a felony, namely: MENACING, as defined by 18-3-206(1)(a)/(b) C.R.S.; in violation of section 18-12-108(1),(2)(c), C.R.S.

COUNT TWELVE

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

On or about July 22, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and SERGIO CASIMIRO-MEJIA was previously convicted of a felony, namely: CRIMINAL ATTEMPT TO ESCAPE, as defined by 18-8-208.1(2) C.R.S., on FEBRUARY 21, 2020 in Arapahoe County Combined Court Case #2019CR2946; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 8 through 12 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on July 21, 2021 and July 22, 2021, an as-yet unidentified enterprise member or members stole a black 2004 Cadillac Escalade belonging to [REDACTED] from [REDACTED] S. Hannibal Way in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$7,150.00.
3. Denver Police Department officers recovered [REDACTED] stolen Escalade on July 22, 2021, at 12635 E Albroom Drive in Denver, Colorado. Casimiro-Mejia was the lone occupant of the stolen vehicle and ran away from it, but was caught on scene. The thief cracked the steering column and ignition, causing more than \$500.00 damage.
4. Casimiro-Mejia, in association with the enterprise, possessed a loaded Ruger .357 Magnum handgun, a drug scale, fifteen small baggies, 9.723 grams of methamphetamine, and 1.050 grams of Fentanyl at the time of his arrest.
5. Casimiro-Mejia possessed a firearm within ten years of his previous conviction or release from confinement or supervision for a Menacing conviction in Denver District Court Case #17CR06482, as defined by Colorado 18-3-206(1)(a)/(b) C.R.S., on March 19, 2018.
6. Casimiro-Mejia possessed a firearm and was previously convicted of Criminal Attempt to Escape in Arapahoe County Combined Court Case #19CR02946, as defined by Colorado 18-8-208.1(2) C.R.S., on February 21, 2020.

COUNT THIRTEEN

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

Between and including August 17, 2021 and August 29, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 13 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on August 16, 2021 and August 17, 2021, an as-yet unidentified enterprise member or members stole a white 2015 Kia Optima sedan belonging to [REDACTED] from the area of E. Arizona Avenue and S. Birch Street in Denver, Colorado. The value of the stolen vehicle was approximately \$9,975.00.
3. Denver Police Department officers recovered [REDACTED] stolen Optima on August 29, 2021, at 3425 W. Kentucky Avenue in Denver, Colorado. Officer saw Casimiro-Mejia and Talamantes, in association with the enterprise, maintain possession and control of the stolen Optima, and arrested them. The thief cracked the steering column and ignition, causing more than \$500.00 damage.

COUNT FOURTEEN

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

Between and including October 11, 2021 and October 14, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN BAEZA DELGADO 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.

Further, on NOVEMBER 5, 2018 the defendant was convicted of an offense involving theft of a motor vehicle in DENVER DISTRICT COURT, DENVER, COLORADO, in case number 17CR07859 and on NOVEMBER 5, 2018 the defendant was convicted of an offense involving theft of a motor vehicle, in DENVER DISTRICT COURT, DENVER, COLORADO, in case number 18CR03667; in violation of section 18-4-409(2),(3)(b), C.R.S.

COUNT FIFTEEN

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

On or about October 14, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN BAEZA DELGADO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and JONATHAN BAEZA DELGADO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT, as defined by 18-4-409(4)(b) C.R.S., on FEBRUARY 25, 2019 in Denver District Court Case #2017CR7859; in violation of section 18-12-108(1), C.R.S.

COUNT SIXTEEN

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

On or about October 14, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN BAEZA DELGADO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and JONATHAN BAEZA DELGADO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT, as defined by 18-4-409(4)(b) C.R.S., on FEBRUARY 25, 2019 in Denver District Court Case #2018CR3667; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 14, 15 and 16 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On October 11, 2021, an as-yet unidentified enterprise member or members stole a white 2021 Jeep Grand Cherokee SUV belonging to [REDACTED] from [REDACTED] River Run Parkway in Henderson, Adams County, Colorado. The value of the stolen vehicle was approximately \$45,075.00.
3. Denver Police Department officers recovered [REDACTED] stolen Grand Cherokee on October 14, 2021, at 1550 S Federal Boulevard in Denver, Colorado. Baeza-Delgado and Dianna Gaucin, in association with the enterprise, were in possession and control of the Grand Cherokee and were arrested.
4. Baeza-Delgado and Gaucin each admitted to driving the Grand Cherokee and to knowing that it was stolen. Further, on November 5, 2018 Baeza-Delgado was convicted of an offense involving theft of a motor vehicle in Denver District Court, Denver, Colorado, in case number 17CR07859 and on November 5, 2018 the defendant was convicted of an offense involving theft of a motor vehicle, in Denver District Court, Denver, Colorado, in case number 18CR03667; in violation of section 18-4-409(2),(3)(b), C.R.S.
5. Baeza-Delgado admitted to possessing a stolen Glock 9mm handgun that was recovered from Gaucin's purse. Two additional stolen handguns were recovered from the Grand Cherokee, but neither Baeza-Delgado or Gaucin claimed possession or knowledge of those firearms.
6. Baeza-Delgado possessed the Glock 9mm firearm and was previously convicted on February 25, 2019 in Denver District Court Case #2017CR7859, for a felony, namely: Aggravated Motor Vehicle Theft In The Second Degree.
7. Baeza-Delgado possessed the Glock 9mm firearm and was previously convicted on February 25, 2019 in Denver District Court Case #2018CR3667, for a felony, namely: Aggravated Motor Vehicle Theft In The Second Degree.
8. Gaucin was charged for offenses related to these events in Denver District Court case # 21CR6117, and that case is pending resolution.

COUNT SEVENTEEN

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA, FABIAN VARELA-CASTILLO and KARINA CARBAJAL committed the felony offense charged in count 19 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 EIGHTEEN

SPECIAL OFFENDER, C.R.S. 18-18-407(1)(d)(I), (DF1) <33A45>

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA committed the felony offense charged in count 19 and used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, namely: three handguns, at the time of the commission of the offense; in violation of section 18-18-407(1)(d)(I), C.R.S.

COUNT NINETEEN

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA, FABIAN VARELA-CASTILLO and KARINA CARBAJAL 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 TWENTY

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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 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-ONE

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of CONTROLLED SUBSTANCE-POSSESSION WITH INTENT TO DITRIBUTE METHAMPHETAMINE, 7 TO 122 GRAMS as set forth in section 18-18-405(1),(2)(b)(I)(B), 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.

Further, on OCTOBER 14, 2016 the defendant was convicted of an offense involving theft of a motor vehicle in ADAMS COUNTY COMBINED COURT, BRIGHTON, COLORADO, in case number 15CR03514 and on JANUARY 30, 2017 the defendant was convicted of an offense involving theft of a motor vehicle, in ARAPAHOE COUNTY COMBINED COURT, CENTENNIAL, COLORADO, in case number 16CR00545; in violation of section 18-4-409(2),(3)(b), C.R.S.

COUNT TWENTY-TWO

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA and KARINA CARBAJAL unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of CONTROLLED SUBSTANCE-POSSESSION WITH INTENT TO DITRIBUTE METHAMPHETAMINE, 7 TO 122 GRAMS, as set forth in 18-18-405(1),(2)(b)(I)(B), 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 TWENTY-THREE

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

On or about October 15, 2021, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 18-4-409(2),(3)(a) C.R.S., on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 17 through 23 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On October 3, 2021, an as-yet unidentified enterprise member or members stole a red 2014 Dodge Charger 100th Anniversary Special Edition sports sedan belonging to [REDACTED] from the Lowe's store located at 1701 South Havana Street, Aurora, Adams County, Colorado. The value of the stolen vehicle was approximately \$50,000.00.
3. On October 15, 2021, an as-yet unidentified enterprise member or members stole a black 2021 Acura TLX sports sedan belonging to [REDACTED] from [REDACTED] E. Chenango Avenue in Denver, Colorado. The value of the stolen vehicle was approximately \$53,075.00.
4. On October 15, 2021, beginning at approximately 11:50 PM, Denver Police officers began surveilling Thomas's stolen red Charger. Officers watched as Jonathan Valdivia met up with Varela-Castillo and Karina Carbajal, who were in [REDACTED] stolen Acura. Officers saw Jonathan Valdivia and Varela-Castillo move property between the two vehicles. Officers saw Jonathan Valdivia and Varela-Castillo attempt to steal another vehicle from the RTD parking lot located at E. 37th Place and N. Ulster Street. Officers moved in to that parking lot in marked police cars to arrest them. Jonathan Valdivia fled at high speed, driving the stolen red Charger. Varela-Castillo and Carbajal fled at high speed in the stolen Acura, with Varela-Castillo driving.
5. Jonathan Valdivia and Varela-Castillo drove their respective stolen cars to a covered parking structure located at 11115 E. Alameda Avenue in Aurora, Colorado. Jonathan Valdivia abandoned [REDACTED] stolen red Charger in that garage and joined Varela-Castillo and Carbajal in [REDACTED] stolen Acura. They then fled the garage and were followed by police officers to the 1600 block of S. Nile Court in Aurora, Colorado.
6. [REDACTED] stolen red Charger was recovered from that parking structure. The Charger had sustained extensive damage after it had been stolen, and had a license plate that belonged to another vehicle attached to the back bumper.
7. Varela-Castillo, Carbajal, and Jonathan Valdivia abandoned [REDACTED] Acura in the 1600 block of S. Nile court and fled on foot to a nearby yard, where they were subsequently arrested.
8. Inside [REDACTED] stolen Acura, officers recovered a loaded Springfield XD .40 caliber handgun from the driver's seat area, 76.506 grams of methamphetamine from the center console, 14.666 grams of methamphetamine from a "Fendi" brand handbag on the driver's floorboard, an AutoProPad Basic Key Programming Tablet with cords, several key fobs, and various handgun and rifle ammunition.
9. Jonathan Valdivia carried three handguns from the Charger when he fled. Those handguns were recovered from the yard where he was captured.

10. Varela-Castillo was in possession and control of [REDACTED] stolen Acura. Previously, on October 14, 2016 Varela-Castillo was convicted of an offense involving theft of a motor vehicle in Adams County Combined Court, Brighton, Colorado, in case number 15CR03514. Varela-Castillo was also convicted on January 30, 2017 of an offense involving theft of a motor vehicle, in Arapahoe County Combined Court, Centennial, Colorado, in case number 16CR00545.

11. Varela-Castillo possessed a firearm and was previously convicted on July 16, 2018 in Denver District Court Case #2017CR8939, for a felony, namely: Aggravated Motor Vehicle Theft In The First Degree.

COUNT TWENTY-FOUR

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about October 23, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA and JONATHAN VALDIVIA unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

The facts supporting Count 24 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On October 23, 2021, an as-yet unidentified enterprise member or members stole a black 2005 GMC Sierra pick up truck belonging to [REDACTED] from [REDACTED] N. 19th Avenue in Brighton, Adams County, Colorado. The value of the stolen vehicle was approximately \$9,000.00, exclusive of significant upgrades that [REDACTED] had made to the suspension, wheels, and tires.
3. On October 23, 2021, between approximately 6:17 PM and 9:59 PM, Susana Garcia and Jonathan Valdivia, in association with the enterprise, accessed Facebook, a computer network, and offered to sell [REDACTED] stolen truck to at least one buyer. Susana Garcia uploaded several images of the stolen truck to show the potential buyer the high quality of the truck, suspension, and custom wheels. Jonathan Valdivia sent those images to a potential buyer.

COUNT TWENTY-FIVE

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

On or about October 26, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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 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. Overnight on October 7, 2021, and October 8, 2021, an as-yet unidentified enterprise member or members stole a black 2020 Mercedes Benz GLC 300 SUV belonging to [REDACTED] from [REDACTED] E. Wyoming Drive in Aurora, Arapahoe County, Colorado. At that time, the Mercedes had the Tennessee license plate assigned to that vehicle affixed to the bumpers. The value of the stolen vehicle was approximately \$44,050.00.
3. On October 26, 2021, Jonathan Valdivia, in association with the enterprise, was in possession and control of [REDACTED] stolen Mercedes. Jonathan Valdivia was arrested in that Mercedes in the parking lot of an auto parts store located at 5690 West Alameda Avenue in Denver, Colorado. The Mercedes bore a Texas license plate instead of the authorized Tennessee license plate.

COUNT TWENTY-SIX

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

On or about October 30, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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 TWENTY-SEVEN

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

On or about October 30, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 Counts 26 and 27 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on October 15, 2021, and October 16, 2021, an as-yet unidentified enterprise member or members stole a grey 2002 GMC Yukon SUV belonging to [REDACTED] from [REDACTED] South Colorado Boulevard in Denver, Colorado. The value of the stolen vehicle was approximately \$9,000.00.
3. During the evening of October 29, 2021, an as-yet unidentified enterprise member or members stole a blue 2012 Hyundai Sonata sedan belonging to [REDACTED] from [REDACTED] E. 5th Circle in Aurora, Colorado. The value of the stolen vehicle was approximately \$8,575.00.
4. On October 30, 2021, at approximately 1:00 PM, Denver Police officers recovered [REDACTED] Yukon and [REDACTED] Sonata parked in the alley behind Casimiro-Mejia and Talamantes's residence at 3485 W. Kentucky Avenue in Denver, Colorado.

5. The door lock, steering column and ignition of [REDACTED] Yukon had been broken by the thief, causing more than \$500.00 damage to the vehicle. "Giggles" and "La China" (nicknames for Talamantes) had been written on surfaces in [REDACTED] Yukon.

6. The door lock, steering column and ignition of [REDACTED] Sonata had been broken by the thief, causing more than \$500.00 damage to the vehicle.

7. On October 30, 2021, at approximately 1:51 PM, Casimiro-Mejia messaged Jonathan Valdivia on Facebook that "Hey the pigs just pulled up to my ally and took my whip and my lady's too."

COUNT TWENTY-EIGHT

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

Between and including November 02, 2021 and November 03, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 TWENTY-NINE

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

Between and including November 02, 2021 and November 03, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 THIRTY

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

On or about November 03, 2021, at or triable in the City and County of Denver, State of Colorado, OLIVIA TALAMANTES 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 28, 29 and 30 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on November 2, 2021, and November 3, 2021, an as-yet unidentified enterprise member or members stole a tan 2015 Kia Optima sedan belonging to [REDACTED] from [REDACTED] S

Joliet Circle in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$15,275.00.

3. Overnight on November 2, 2021, and November 3, 2021, an as-yet unidentified enterprise member or members stole a silver 2018 Hyundai Tucson SUV belonging to [REDACTED] and [REDACTED] from [REDACTED] E. 36th Avenue in Denver, Colorado. The value of the stolen vehicle was approximately \$23,925.00.

4. [REDACTED] personal and financial documents, including a [REDACTED] financial transaction device, was in the Tucson when it was stolen. On November 3, 2021, Talamantes, in association with the enterprise, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority to make purchases at various Walmart and Home Depot stores in Denver and Aurora, Colorado.

5. Surveillance video showed that on November 3, 2021 at approximately 7:45 AM, a male drove [REDACTED] stolen Optima to the Walmart located at 3301 Tower Road in Aurora, Colorado, while Talamantes drove [REDACTED] stolen Tucson to the same location at the same time. The male moved items between those two stolen vehicles while Talamantes used [REDACTED] stolen card in the store.

6. On November 3, 2021 at approximately 4:00 PM, Casimiro-Mejia and Talamantes were in possession and control of [REDACTED] stolen Optima at their residence on W. Kentucky Avenue when Denver Police officers attempted to take them into custody. They recklessly fled in the Optima and then abandoned the vehicle at 320 S. Lipan Street in Denver. Talamantes was caught but Casimiro-Mejia escaped. The door lock, steering column and ignition of [REDACTED] Optima had been broken by the thief, causing more than \$500.00 damage to the vehicle.

7. Among the items recovered from [REDACTED] Optima were the license plate belonging to [REDACTED] stolen Tucson; several key fobs, and two Autel brand key programming devices.

8. On November 10, 2021, [REDACTED] stolen Tucson was recovered by Aurora Police officers at E. 31st Avenue and N. Racine Street. The driver's door latch had been damaged by the thief, causing more than \$500.00 damage to the vehicle.

COUNT THIRTY-ONE

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

On or about November 05, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA 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 THIRTY-TWO

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about November 05, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

The facts supporting Counts 31 and 32 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 5, 2021, Susana Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly obtained or exercised control over the maroon 2006 Chevrolet Silverado pick up truck owned by [REDACTED]. The truck was stolen from [REDACTED] W. 73rd Place in unincorporated Adams County, Colorado. The value of the stolen truck was approximately \$12,175.00.
3. On November 5, 2021, between approximately 5:56 AM and 7:37 PM, Susana Garcia accessed Facebook, a computer network, and offered to sell [REDACTED] stolen truck to at least one buyer. Susana Garcia uploaded a video of [REDACTED] stolen truck to show the potential buyer the high quality of the truck and custom wheels.

COUNT THIRTY-THREE

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

Between and including November 08, 2021 and November 09, 2021, at or triable in the City and County of Denver, State of Colorado, OLIVIA TALAMANTES 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 33 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on November 7, 2021, and November 8, 2021, an as-yet unidentified enterprise member or members stole a beige 2005 Cadillac Escalade SUV belonging to [REDACTED] from [REDACTED] S. Ivory Court in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$6,725.00.
3. On November 9, 2021, Denver Police officers saw Talamantes in possession and control of [REDACTED] stolen Escalade at and around Talamantes's residence located at 3485 W. Kentucky Avenue. The authorized license plates had been removed and replaced with a license plate that had been stolen from another Escalade.
4. Officers recovered Camacho's stolen Escalade on November 9, 2021. The door lock, steering column and ignition of the SUV had been broken by the thief, causing more than \$500.00 damage to the vehicle.

COUNT THIRTY-FOUR

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

Between and including November 10, 2021 and November 12, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 34 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 10, 2021 between 10:00 AM and 6:45 PM, an as-yet unidentified enterprise member or members stole a beige 2005 GMC Sierra pick-up truck belonging to [REDACTED] from [REDACTED] N. Yuba Way in Denver, Colorado. The value of the stolen vehicle was approximately \$8,325.00.
3. On November 10, 2021, Denver Police officers saw Casimiro-Mejia and Talamantes in possession and control of [REDACTED] stolen Sierra at and around their residence located at 3485 W. Kentucky Avenue.
4. Officers recovered [REDACTED] stolen Sierra on November 12, 2021. The door lock, steering column and ignition of the truck had been broken by the thief, causing more than \$500.00 damage to the vehicle.

COUNT THIRTY-FIVE

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about November 12, 2021, at or triable in the City and County of Denver, State of Colorado, KARINA CARBAJAL unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

The facts supporting Count 35 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 10, 2021, an as-yet unidentified enterprise member or members stole a red 2004 Cadillac Escalade SUV belonging to [REDACTED] from [REDACTED] S. Xanadu Way in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$6,175.00, exclusive of significant upgrades [REDACTED] had made to the exterior, wheels, and tires.
3. On November 12, 2021, between approximately 11:17 AM and 11:19 AM, Karina Carbajal, in association with the enterprise, accessed Facebook, a computer network, and offered to sell [REDACTED] stolen SUV and / or wheels to at least two buyers. Carbajal uploaded at least one image of the stolen SUV to show the potential buyers the high quality of the SUV, and custom wheels.
4. On November 22, 2021, [REDACTED] SUV was recovered at E. 56th and N. Revere Street. The custom wheels had been removed and replaced with lower quality wheels. Other items had also been stolen from the SUV.

COUNT THIRTY-SIX

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

On or about November 13, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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-SEVEN

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about November 13, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

The facts supporting Counts 36 and 37 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 13, 2021, Jonathan Valdivia, in association with the enterprise, unlawfully, feloniously, and knowingly obtained or exercised control over the white 2009 Chevrolet Trailblazer SUV owned by [REDACTED]. The SUV was stolen from [REDACTED] Community Center Drive in Northglenn, Adams County, Colorado. The value of the stolen SUV was approximately \$6,225.00.
3. On November 13, 2021, between approximately 6:00 AM and 5:23 PM, Jonathan Valdivia accessed Facebook, a computer network, and engaged in a conversation with a Facebook user with the screen name "Felipe Garcia" regarding how to get a false title for [REDACTED] stolen Trailblazer. Jonathan Valdivia uploaded at least two images of the stolen Trailblazer and shared those with "Felipe Garcia."
4. On February 8, 2022, a white Trailblazer with false VINs and false title was found by a Metropolitan Auto Theft Task Force (CMATT) detective to be [REDACTED] stolen SUV. That SUV was recovered at 505 Sheridan Boulevard in Lakewood, Colorado.

COUNT THIRTY-EIGHT

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

On or about November 14, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA 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 THIRTY-NINE

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about November 14, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

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 November 14, 2021, Susana Garcia, in association with the enterprise, unlawfully, feloniously, and knowingly obtained or exercised control over the blue 2007 Chevrolet Silverado owned by [REDACTED]. The truck was stolen from [REDACTED] N. Peoria Street in Denver, Colorado. The value of the stolen truck was approximately \$13,375.00.
3. On November 14, 2021, at approximately 11:21 AM, Susana Garcia accessed Facebook, a computer network, and engaged in a conversation with [REDACTED] a known car thief, about [REDACTED] truck. Susana Garcia posted an image of [REDACTED] truck, and [REDACTED] asks Garcia if she is "Task Force" now because some Metropolitan Auto Theft Task Force undercover detectives drive similar Silverado trucks.
4. [REDACTED] stolen Silverado was recovered by police officers on January 7, 2022, at 3173 S. Urvah Way in Aurora, Colorado.

COUNT FORTY

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

On or about November 17, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA, OLIVIA TALAMANTES, and KARINA CARBAJAL unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 40 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on November 16, 2021 and November 17, 2021, an as-yet unidentified enterprise member or members stole a green 2002 GMC Sierra pick-up truck belonging to [REDACTED] from [REDACTED] S. Oswego Street in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$6,425.00.
3. On November 17, 2021, Denver Police officers saw Casimiro-Mejia, Talamantes and Carbajal in possession and control of [REDACTED] stolen Sierra at and around their residence located at 3485 W. Kentucky Avenue.
4. Officers recovered McCourt's stolen Sierra on November 22, 2021. The door lock, steering column and ignition of the truck had been broken by the thief, causing more than \$500.00 damage to the vehicle.

COUNT FORTY-ONE

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

On or about November 23, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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 FORTY-TWO

CYBERCRIME, C.R.S. 18-5.5-102(1)(d),(3)(a)(VI), (F5) <1503Q>

On or about November 23, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-5.5-102(1)(d),(3)(a)(VI), C.R.S.

The facts supporting Counts 41 and 42 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 23, 2021, Jonathan Valdivia, in association with the enterprise, unlawfully, feloniously, and knowingly obtained or exercised control over the white 2014 Kia Optima sedan owned by [REDACTED]. The Optima was stolen from [REDACTED] S. Ulster Street in Denver, Colorado. The value of the stolen sedan was approximately \$11,900.00.
3. On November 23, 2021, at approximately 1:50 AM, Jonathan Valdivia accessed Facebook, a computer network, and engaged in a conversation with a Facebook user with the screen name "Alfredo Ramirez." Ramirez wanted to borrow the stolen Optima from Valdivia. Jonathan Valdivia uploaded at least two images of the stolen Optima and shared those with "Alfredo Ramirez."
4. On November 23, 2021 at approximately 9:40 PM, [REDACTED] stolen Optima was involved in a hit and run accident wherein shots were fired from [REDACTED] vehicle at the other car. The driver of [REDACTED] stolen Optima crashed at 1st Avenue and Lima street in Aurora, Colorado and escaped capture. Shell casings from the incident were matched to a pistol recovered from Jonathan Valdivia, as noted in the facts supporting Counts 52 through 57 of this Indictment.

COUNT FORTY-THREE

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

On or about November 29, 2021, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA and FABIAN VARELA-CASTILLO 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.

The facts supporting Count 43 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 29, 2021 at approximately 4:00 AM, as-yet unidentified enterprise members broke entry into the [REDACTED] company's offices, storage sheds, shops, and fenced in yard located at [REDACTED] W. Jewell Avenue, in Denver, Colorado.
3. As-yet unidentified enterprise members stole six trucks and three trailers from [REDACTED], and damaged other vehicles while attempting to steal those. The aggregate value of the stolen items was approximately \$196,000.00.
4. One of the stolen trucks was a white Ford F150 pick-up truck with an approximate value of \$57,675.00.
5. On November 30, 2021, that F150 was involved in an eluding incident when Thornton Police officers attempted to stop it. The driver drove recklessly, fled, and was not pursued by the police. Shortly thereafter, that truck was abandoned at 15889 Clayton Way in Adams County, Colorado.
6. That F150 was secured, towed, and processed. Latent fingerprints identified as those of Fabian Varela-Castillo were recovered from the interior rear view mirror and the exterior driver's door. Susana Garcia's latent fingerprint was recovered from the exterior rear driver's side window glass, top of the window, with fingertips pointed down.

COUNT FORTY-FOUR

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA 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 FORTY-FIVE

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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 FORTY-SIX

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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 FORTY-SEVEN

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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-EIGHT

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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, C.R.S. 18-5-902(1)(b), (F4) <1307H>

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES 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, C.R.S. 18-5-902(1)(b), (F4) <1307H>

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA and OLIVIA TALAMANTES unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-ONE

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

On or about December 02, 2021, at or triable in the City and County of Denver, State of Colorado, OLIVIA TALAMANTES unlawfully, feloniously, and knowingly possessed, used, or carried upon her person a FIREARM and OLIVIA TALAMANTES was previously convicted of a felony, namely: ATTEMPT FIRST DEGREE CRIMINAL TRESPASS, as defined by 18-5-502 C.R.S., on AUGUST 19, 2013 in Jefferson County Case #2010CR3192; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 44 through 51 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On November 29, 2021, between 1:30 PM and 11:00 PM, an as-yet unidentified enterprise member or members stole a black 2007 Chevrolet Silverado pick-up truck belonging to [REDACTED] from the RTD parking lot located at 3900 N. Salida Street in Aurora, Adams County, Colorado. The value of the stolen vehicle was approximately \$7,450.00.
3. Sometime between November 25, 2021 and November 29, 2021, an as-yet unidentified enterprise member or members stole a grey 2015 Subaru Impreza sedan belonging to [REDACTED] from [REDACTED] 71st Avenue in Westminster, Adams County, Colorado. The value of the stolen vehicle was approximately \$14,500.00.
4. On December 2, 2021, Denver Police officers saw Casimiro-Mejia and Talamantes in possession and control of [REDACTED] stolen Silverado and Christianson's stolen Impreza at and around their residence located at 3485 W. Kentucky Avenue.
5. As investigators conducted surveillance, they observed Talamantes drive each stolen vehicle. Casimiro-Mejia drove the Silverado to 7th Street and Water Street in Denver, and was joined by Talamantes in the stolen Impreza. Both moved items from the stolen Silverado to the stolen Impreza before officers took them into custody.
6. When Officers recovered Martinez' stolen Silverado on December 2, 2021, they discovered the vehicle was displaying a stolen license plate on the front and a misused temporary plate on the rear.
7. When recovered on December 2, 2021, [REDACTED] stolen Impreza displayed a misused temporary plate on the rear.
8. Casimiro-Mejia possessed 10.983 grams of methamphetamine when he was arrested.

9. [REDACTED], [REDACTED], [REDACTED], and [REDACTED] all had their respective motor vehicle stolen between November 16, 2021 and December 1, 2021. On December 2, 2021, Casimiro-Mejia and Talamantes possessed items including, but not limited to, birth certificates, credit cards, drivers licenses, and check books belonging to [REDACTED], [REDACTED], [REDACTED], and [REDACTED].

10. Talamantes possessed a Glock 17 handgun when she was arrested. Talamantes possessed that firearm and was previously convicted on August 19, 2013, in Jefferson County District court case #2010CR3192 for a felony, namely: Criminal Trespass of a Motor Vehicle in the First Degree.

COUNT FIFTY-TWO

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

On or about December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA committed the felony offense charged in count 53 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-THREE

POSSESSION OF A CONTROLLED SUBSTANCE - SCHEDULE I OR II, C.R.S. 18-18-403.5(1),(2)(a) (DF4) <8101D>

On or about December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA unlawfully, feloniously, and knowingly possessed a material compound, mixture, or preparation that contained more than four grams of FENTANYL, a schedule I or II controlled substance; in violation of section 18-18-403.5(1),(2)(a), C.R.S.

COUNT FIFTY-FOUR

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

On or about December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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 FIFTY-FIVE

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

On or about December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-SIX

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

On or about December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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-SEVEN

THEFT, C.R.S. 18-4-401(1),(2)(h), (F4) <08A15>

Between and including February 04, 2021 and December 10, 2021, at or triable in the City and County of Denver, State of Colorado, JONATHAN BAEZA DELGADO and DEBBIE VALDIVIA 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: 2016 SPORT TREK CAMPER TRAILER, of [REDACTED] with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The facts supporting Counts 52 through 57 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on October 27, 2021 and October 8, 2021, an as-yet unidentified enterprise member or members stole a tan 2006 GMC Sierra pick-up truck belonging to [REDACTED] from the Holiday Inn Express located at 14200 E Colfax Avenue in Aurora, Arapahoe County, Colorado. The value of the stolen vehicle was approximately \$13,800.00. Pennsylvania license plates assigned to [REDACTED] truck were affixed to the bumpers at the time it was stolen.
3. Overnight on November 7, 2021 and November 8, 2021, an as-yet unidentified enterprise member or members stole a white 2003 Chevrolet Tahoe SUV belonging to [REDACTED] from [REDACTED] N. Billings Street in Aurora, Adams County, Colorado. The value of the stolen vehicle was approximately \$5,500.00.
4. On November 7, 2021 at approximately 5:39 AM, an as-yet unidentified enterprise member or members stole a white 2016 KZ brand "Sport Trek" camper trailer belonging to [REDACTED] from [REDACTED] located at [REDACTED] Turner Boulevard in Weld County, Colorado. The value of the stolen trailer was approximately \$25,999.00.

5. On December 5, 2021 in the early morning hours an as-yet unidentified enterprise member or members broke into a white 2006 Chevrolet Silverado pick-up truck belonging to [REDACTED] at [REDACTED] E Andrews Drive in Denver, Colorado, in an attempt to steal the truck. The truck was not stolen, but personal and financial identifying documents belonging to members of the [REDACTED] family were stolen from the truck.

6. On December 10, 2021 at approximately 4:00 AM, CMATT and Adams County S.W.A.T. executed a search warrant at the property known to enterprise members as "The Ranch" or "rancho" located at 7010 N. Manilla Road in the City of Bennett, Adams County, Colorado.

7. On December 10, 2021 at approximately 4:00 AM, Jonathan Valdivia, in association with the enterprise, possessed and controlled [REDACTED] stolen 2006 GMC Sierra. Jonathan Valdivia was arrested from inside that truck at 7010 N. Manilla Road during the execution of the search warrant. A Colorado license plate that had been stolen from another truck was affixed to [REDACTED] stolen Sierra in place of the authorized Pennsylvania license plate.

8. At the time of his arrest, Jonathan Valdivia, in association with the enterprise, possessed forty-eight (48) blue pills with a net weight of 4.620 grams of Fentanyl.

9. At the time of his arrest, Jonathan Valdivia, in association with the enterprise, possessed a loaded Glock 43 9mm handgun. That pistol had been used in the shots fired incident that occurred in Aurora on November 23, 2021 as noted in the facts supporting Counts 41 and 42 of this Indictment.

10. At the time of his arrest, Jonathan Valdivia, in association with the enterprise, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial devices that had been stolen from [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.

11. On December 10, 2021 at approximately 4:00 AM Debbie Valdivia, in association with the enterprise, was in possession and control of [REDACTED] stolen Sport Trek camper at 7010 N. Manila Road. Debbie Valdivia and Jonathan Baeza-Delgado were using that stolen trailer as their living quarters on "The Ranch." Debbie Valdivia was arrested from inside that trailer during the execution of the search warrant. A latent fingerprint from the bathroom cabinet mirror was identified as a fingerprint of Jonathan Baeza-Delgado.

COUNT FIFTY-EIGHT

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

On or about December 18, 2021, at or triable in the City and County of Denver, State of Colorado, FELIX LOPEZ 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] S FEDERAL BLVD with the intent to commit therein the crime of AGGRAVATED MOTOR VEHICLE THEFT; in violation of section 18-4-203(1), C.R.S.

COUNT FIFTY-NINE

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

On or about December 18, 2021, at or triable in the City and County of Denver, State of Colorado, DIANNA GAUCIN 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.

COUNT SIXTY

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

On or about December 20, 2021, at or triable in the City and County of Denver, State of Colorado, ESEQUIEL GOMEZ 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.

The facts supporting Counts 58, 59 and 60 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On December 18, 2021 at approximately 6:40 AM, Felix Lopez and other, as-yet unidentified enterprise members broke entry into the [REDACTED] customized truck sales company's offices located at [REDACTED] S. Federal Boulevard, in Denver, Colorado. Enterprise members broke entry into a safe that contained keys for all of the trucks on the sale lot, as well as high value binoculars and company checkbooks.
3. Felix Lopez and other as-yet unidentified enterprise members stole eleven vehicles from [REDACTED]. The aggregate value of the stolen items was approximately \$611,000.00.

4. One of the stolen trucks was a customized blue Ram 1500 pick-up truck with an approximate value of \$40,300.00.

5. On December 18, 2021, that Ram truck was discovered by [REDACTED] as it was parked in front of 3485 W. Kentucky Avenue in Denver, Colorado. [REDACTED] boxed that Ram in and confronted Dianna Gaucin, who was driving the Ram at that time. Gaucin drove the Ram recklessly and was able to escape in the Ram. That Ram was recovered on December 20, 2021 in Thornton, Colorado.

6. Another one of the stolen trucks was a customized black Chevrolet Silverado pick-up truck with an approximate value of \$56,400.00.

7. On December 21, 2021, that Silverado was recovered by Denver Police officers from 3550 S. Kendall Street in Denver, Colorado. That Silverado was secured, towed, and processed. Latent fingerprints identified as those of Esequiel Gomez, a known associate of Fabian Varela-Castillo, were recovered from a glass pipe from the interior of the Silverado.

COUNT SIXTY-ONE

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

On or about January 04, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED] without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

Further, on OCTOBER 14, 2016 defendant was convicted of an offense involving theft of a motor vehicle in ADAMS COUNTY COMBINED COURT, BRIGHTON, COLORADO, in case number 15CR03514 and on JANUARY 30, 2017 defendant was convicted of an offense involving theft of a motor vehicle, in ARAPAHOE COUNTY COMBINED COURT, CENTENNIAL, COLORADO, in case number 16CR00545; in violation of section 18-4-409(2),(3)(b), C.R.S.

COUNT SIXTY-TWO

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

On or about January 04, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 18-4-409(2),(3)(a) C.R.S., on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

COUNT SIXTY-THREE

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

On or about January 04, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 8-4-409(2),(3)(a) C.R.S., on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

COUNT SIXTY-FOUR

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

On or about January 04, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a FIREARM, and FABIAN VARELA-CASTILLO was previously convicted of a felony, namely: AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, as defined by 18-4-409(2),(3)(a), on JULY 16, 2018 in Denver District Court Case #2017CR8939; in violation of section 18-12-108(1), C.R.S.

The facts supporting Counts 61 through 64 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 4, 2022, Varela-Castillo, in association with the enterprise, stole a black 2018 GMC Sierra pick-up truck belonging to [REDACTED] dealership located at [REDACTED] W. Countyline Road in Highlands Ranch, Douglas County, Colorado. The value of the stolen vehicle was approximately \$52,500.00.
3. On January 4, 2022, Varela-Castillo was driving [REDACTED] stolen Sierra and fled contact with Northglenn Police officers. Officers did not pursue. Varela-Castillo drove recklessly and crashed the stolen Sierra into a residence located at [REDACTED] Melody Drive, in Northglenn, Adams County, Colorado. Varela-Castillo was taken into custody at that time. The traffic crash caused more than \$500 damage to the stolen Sierra.
4. At the time of his arrest on January 4, 2022, Varela-Castillo possessed three handguns:
 - 9mm Canik TP9, serial number [REDACTED];
 - .45 caliber Colt 1911, serial number [REDACTED];
 - 9mm Taurus, serial number [REDACTED].
5. On January 4, 2022, Varela-Castillo was in possession and control of the stolen GMC Sierra. Previously, on October 14, 2016, Varela-Castillo was convicted of an offense involving theft of a motor vehicle in Adams County Combined Court, Brighton, Colorado, in case number 15CR03514. Varela-Castillo was also convicted on January 30, 2017 of an offense involving theft of a motor vehicle, in Arapahoe County Combined Court, Centennial, Colorado, in case number 16CR00545.
6. On January 4, 2022, Varela-Castillo possessed three firearms and was previously convicted on July 16, 2018 in Denver District Court Case #2017CR8939, for a felony, namely: Aggravated Motor Vehicle Theft In The First Degree.

COUNT SIXTY-FIVE

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

On or about January 06, 2022, at or triable in the City and County of Denver, State of Colorado, OLIVIA TALAMANTES unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of 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 65 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on January 4, 2022 and January 5, 2022, an as-yet unidentified enterprise member or members stole a white 2011 Kia Sorento SUV belonging to [REDACTED] from [REDACTED] E 48th Avenue in Denver. The value of the stolen vehicle was approximately \$18,450.00.
3. On January 6, 2022, Denver Police officers saw Talamantes in possession and control of [REDACTED] stolen Sorento at her residence located at 3485 W. Kentucky Avenue, and arrested Talamantes.
4. The ignition of the Sorento had been broken by the thief, causing more than \$500.00 damage to the vehicle.

COUNT SIXTY-SIX

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

On or about February 28, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO 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] S PLATTE RIVER DR [REDACTED] with the intent to commit therein the crime of AGGRAVATED MOTOR VEHICLE THEFT; in violation of section 18-4-203(1), C.R.S.

The facts supporting Count 66 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On February 28, 2022 at approximately 1:47 AM, Varela-Castillo and other, as-yet unidentified enterprise members broke entry into the [REDACTED] showroom and offices located at [REDACTED] S. Platte River Drive, in Denver, Colorado. Enterprise members broke through a roll-up door and stole several key programmers, a pistol, tools, and nine vehicles.
3. The aggregate value of the stolen items was approximately \$360,000.00.
4. The burglary scene was processed and a latent print obtained from a Jaguar SUV in the showroom was identified as belonging to Varela-Castillo.

COUNT SIXTY-SEVEN

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

On or about March 24, 2022, at or triable in the City and County of Denver, State of Colorado, SERGIO CASIMIRO-MEJIA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute FENTANYL, a schedule I or II controlled substance; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

The facts supporting Count 67 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On March 24, 2022, Casimiro-Mejia was arrested by parole officers and brought to the Denver Police Department station located at 4685 N. Peoria Street in Denver, Colorado.
3. When he was arrested, Casimiro-Mejia possessed thirty five (35) blue pills which tested positive for 3.893 grams of Fentanyl.

COUNT SIXTY-EIGHT

ASSAULT IN THE FIRST DEGREE, C.R.S. 18-3-202(1)(a), (F3) <02011>

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA, with intent to cause serious bodily injury to another person, unlawfully and feloniously caused serious bodily injury to [REDACTED], by means of a deadly weapon, namely: MOTOR VEHICLE; in violation of section 18-3-202(1)(a), C.R.S.

COUNT SIXTY-NINE

ASSAULT IN THE FIRST DEGREE, C.R.S. 18-3-202(1)(c), (F3) <02015>

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA, under circumstances manifesting extreme indifference to the value of human life, unlawfully, feloniously, and knowingly engaged in conduct which created a grave risk of death to another, and thereby caused serious bodily injury to [REDACTED]; in violation of section 18-3-202(1)(c), C.R.S.

COUNT SEVENTY

LEAVING THE SCENE OF AN ACCIDENT, C.R.S. 42-4-1601(1),(2)(b), (F4) <7314C>

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA, the driver of a vehicle directly involved in an accident resulting in serious bodily injury to [REDACTED], unlawfully and feloniously failed to immediately stop the vehicle at the scene of the accident or as close thereto as possible or immediately return to the scene of the accident until the driver had fulfilled the requirements of section 42-4-1603, C.R.S.; in violation of section 42-4-1601(1),(2)(b), C.R.S.

COUNT SEVENTY-ONE

VEHICULAR ASSAULT, C.R.S. 18-3-205(1)(a), (F5) <02041>

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA unlawfully and feloniously operated or drove a motor vehicle in a reckless manner, and the conduct was the proximate cause of serious bodily injury to [REDACTED] in violation of section 18-3-205(1)(a), C.R.S.

COUNT SEVENTY-TWO

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

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA GARCIA unlawfully, feloniously, and knowingly obtained or exercised control over the

motor vehicle of [REDACTED], without authorization, or by threat or deception, and caused bodily injury to another person, namely: [REDACTED] while in the exercise of control of 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 SEVENTY-THREE

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

On or about March 28, 2022, at or triable in the City and County of Denver, State of Colorado, SUSANA 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 two 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 68 through 73 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On March 28, 2022, Susana Garcia, in association with the enterprise and in the company of an as-yet unidentified enterprise member in another vehicle, stole a Beige 2011 Hyundai Genesis sport sedan belonging to [REDACTED] from the parking lot of the [REDACTED] located at [REDACTED] S. Monaco Street in Denver, Colorado. The value of the stolen vehicle was approximately \$10,000.00.
3. [REDACTED] confronted Susana Garcia as she was driving his car and ended up riding on the hood of the vehicle as Susana Garcia drove out of the parking lot and onto Monaco Street.
4. Susana Garcia drove recklessly, at high speed, weaving back and forth, and making a U-turn on Monaco Street in an attempt to knock [REDACTED] off the hood of the vehicle.
5. [REDACTED] eventually rolled off the hood of the moving vehicle. Susana Garcia ran over [REDACTED] causing serious bodily injury, including, but not limited to, substantial risk of protracted loss or impairment of any part or organs as well as [REDACTED].
6. Susana Garcia fled the scene at high speed and did not stop to render aid to [REDACTED].
7. [REDACTED] stolen vehicle was recovered on March 31, 2022 in the 8200 block of E. Beekman Place in Denver, Colorado. The windows had been tinted by an enterprise member or members. A latent fingerprint on the tint was identified as that of Susana Garcia.

COUNT SEVENTY-FOUR

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

On or about March 29, 2022, at or triable in the City and County of Denver, State of Colorado, FABIAN VARELA-CASTILLO 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.

Further, on OCTOBER 14, 2016 defendant was convicted of an offense involving theft of a motor vehicle in ADAMS COUNTY COMBINED COURT, BRIGHTON, COLORADO, in case number 15CR03514 and on JANUARY 30, 2017 defendant was convicted of an offense involving theft of a motor vehicle, in ARAPAHOE COUNTY COMBINED COURT, CENTENNIAL, COLORADO, in case number 16CR00545; in violation of section 18-4-409(2),(3)(b), C.R.S.

The facts supporting Count 74 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On March 23, 2022, an as-yet unidentified enterprise member or members stole a black 2014 Ram 1500 pick-up truck belonging to [REDACTED] from [REDACTED] Marine Street in Boulder, Boulder County, Colorado. The value of the stolen vehicle was approximately \$24,900.00.
3. On March 29, 2022, Denver Police officers saw Varela-Castillo, in association with the enterprise, in possession and control of [REDACTED] stolen Ram as Varela-Castillo drove it around the Denver metropolitan area.
4. On March 29, 2022, Denver Police officers arrested Varela-Castillo after he abandoned [REDACTED] stolen Ram truck at N. Wabash Street and E. 25th Avenue in Denver, Colorado.
5. On March 29, 2022, Varela-Castillo was in possession and control of [REDACTED] stolen Ram truck. Further, on October 14, 2016 Varela-Castillo was convicted of an offense involving theft of a motor vehicle in Adams County Combined Court, Brighton, Colorado, in case number 15CR03514. Varela-Castillo was also convicted on January 30, 2017 of an offense involving theft of a motor vehicle, in Arapahoe County Combined Court, Centennial, Colorado, in case number 16CR00545.

COUNT SEVENTY-FIVE

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

On or about April 07, 2022, at or triable in the City and County of Denver, State of Colorado, JONATHAN VALDIVIA 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 75 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Overnight on April 6, 2022 and April 7, 2022, an as-yet unidentified enterprise member or members stole a grey 2018 Kia Optima sedan belonging to [REDACTED] from [REDACTED] E. 107th Place in Commerce City, Adams County, Colorado. The value of the stolen vehicle was approximately \$18,450.00.
3. On April 14, 2022, Denver Police officers saw Jonathan Valdivia, in association with the enterprise, in possession and control of [REDACTED] stolen Optima as Jonathan Valdivia drove it around the Denver metropolitan area.
4. On April 14, 2022, Denver Police officers arrested Jonathan Valdivia after he abandoned [REDACTED] stolen Optima near his residence located at 3635 W. 13th Avenue in Denver, Colorado.
5. When the Optima was recovered at the time of Valdivia's arrest, it had a misused license plate affixed to the rear.