

District Court, City and County of Denver, Colorado City and County Building, Room 275 1437 Bannock Street Denver, CO 80202 <hr/> Plaintiff: THE PEOPLE OF THE STATE OF COLORADO Defendant(s): JORDAN ASHLEY KEIICHI HIRAMATSU RYAN JENNINGS DOUGLAS JUMP SHAWN MCCLINTOCK KAISHA VALENTIN BRANDON CLEMENTS	<div style="text-align: center; padding-top: 100px;">COURT USE ONLY</div> <hr/> Case Number: Grand Jury No. 25CR2A Div.: Criminal Ctrm: 275 / ____
INDICTMENT	

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

THIRD DEGREE BURGLARY, C.R.S. 18-4-204(1), (M2) < 06044 > 2 (1 count)

POSSESSION OF IDENTITY THEFT TOOLS, C.R.S. 18-5-905, (F5) < 13085 > 3, 6, 77 (3
 counts)

CONSPIRACY TO COMMIT IDENTITY THEFT, C.R.S. 18-5-902(1)(c);18-2-201, (F5) <
 1307JC > 4 (1 count)

UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE, C.R.S. 18-18-
 403.5(1),(2)(a), (DF4) < 8101D > 5 (1 count)

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1),(2)(a), (F4) < 0603A > 7 (1 count)

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1),(2)(b)(I), (F3) < 06036 > 8, 32 (2 counts)

IDENTITY THEFT, C.R.S. 18-5-902(1)(c), (F4) < 1307J > 9, 11, 13, 16, 18, 20, 22, 24, 26, 28,
 30, 40, 45, 49, 52, 62, 64, 68, 71, 75, 78, 83, 88, 93, 96, 111, 123 (27 counts)

FORGERY, C.R.S. 18-5-102(1)(e), (F5) < 1001E > 10, 12, 14, 17, 19, 21, 23, 25, 27, 29, 31, 38,
 41, 46, 50, 53, 63, 65, 69, 72, 76, 79, 84, 89, 94, 97, 112, 124 (28 counts)

IDENTITY THEFT, C.R.S. 18-5-902(1)(a), (F4) < 1307G > 15, 36, 37, 42, 43, 44, 47, 48, 51, 56, 57, 60, 61, 66, 67, 70, 73, 74, 80, 85, 90, 95, 98, 99, 101, 102, 106, 109, 114, 117, 120, 125, 129 (33 counts)

MOTOR VEHICLE THEFT IN THE FIRST DEGREE, C.R.S. 18-4-409(2), (F3) < 0804Q > 33 (1 count)

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306, (F4) < 24051 > 34 (1 count)

FORGERY, C.R.S. 18-5-102(1)(c), (F5) < 1001K > 35, 81, 86, 92, 107, 110, 115, 118, 121, 126, 130 (11 counts)

POSSESSION OF A FORGERY DEVICE, C.R.S. 18-5-109(1)(a),(2)(a), (F5) < 10078 > 39 (1 count)

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M > 54, 55, 58, 59, 100, 103, 116, 119, 128 (9 counts)

THEFT, C.R.S. 18-4-401(1),(2)(e), (M1) < 08A1D > 82, 87 (2 counts)

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3), (F4) < 0804P > 91, 104, 108, 113 (4 counts)

MOTOR VEHICLE THEFT IN THE THIRD DEGREE, C.R.S. 18-4-409(4)(a), (F5) < 0804M > 105 (1 count)


THEFT, C.R.S. 18-4-401(1),(2)(h), (F4) < 08A1G > 122 (1 count)

THEFT, C.R.S. 18-4-401(1),(2)(g), (F5) < 08A1F > 127 (1 count)

THEFT, C.R.S. 18-4-401(1),(2)(f), (F6) < 08A1E > 131 (1 count)

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

Dated this 17th day of December, 2025.



Kandace C. Gerdes
Presiding Judge
Denver District Court

INDICTMENT

STATE OF COLORADO)
)
COUNTY OF DENVER)

Of the term of the District Court in the year 2025, 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: JORDAN ASHLEY, KEIICHI HIRAMATSU, RYAN JENNINGS, DOUGLAS JUMP, SHAWN MCCLINTOCK, KAISHA VALENTIN, and BRANDON CLEMENTS 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 17th day of December, 2025.

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

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT TWO:
(burglary 3)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT THREE:
(possession of identity theft tools)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FOUR:
(id theft-alter/make written inst-csp)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT FIVE:
(controlled sub-poss >4 g sch 1/2)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT SIX:
(possession of identity theft tools)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT SEVEN:
(burglary 2-occupied struct/commercial b)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHT:
(burglary 2-of dwelling)

TRUE BILL

NO TRUE BILL

AS TO COUNT NINE:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TEN:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT ELEVEN:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWELVE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTEEN:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT FOURTEEN:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTEEN:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTEEN:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHTEEN:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT NINETEEN:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-ONE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-TWO:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-THREE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-FOUR:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-FIVE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-SIX:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-SEVEN:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-EIGHT:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT TWENTY-NINE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-ONE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-TWO:
(burglary 2-of dwelling)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-THREE:
(motor vehicle theft 1st degree)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-FOUR:
(public servant-attempt to influence)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-FIVE:
(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-EIGHT:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT THIRTY-NINE:
(forgery device/possess-counterfeit equip)

TRUE BILL

NO TRUE BILL

AS TO COUNT FORTY:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT FORTY-ONE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT FORTY-FIVE:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT FORTY-SIX:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT FORTY-NINE:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-TWO:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT FIFTY-THREE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

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-uses info to obtain)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-TWO:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-THREE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-FOUR:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-FIVE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-EIGHT:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SIXTY-NINE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-ONE:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-TWO:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-FIVE:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-SIX:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-SEVEN:
(possession of identity theft tools)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-EIGHT:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT SEVENTY-NINE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

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

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHTY-ONE:
(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHTY-TWO:
(theft-\$1,000-\$2,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT EIGHTY-THREE:
(id theft-alter/make written inst)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHTY-FOUR:
(forgery-government issued document)

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHTY-SIX:
(forgery-commercial instrument)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHTY-SEVEN:
(theft-\$1,000-\$2,000)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHTY-EIGHT:
(id theft-alter/make written inst)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT EIGHTY-NINE:
(forgery-government issued document)

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-ONE:
(motor vehicle theft 2nd degree)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-TWO:
(forgery-commercial instrument)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-THREE:
(id theft-alter/make written inst)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-FOUR:
(forgery-government issued document)

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-SIX:
(id theft-alter/make written inst)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT NINETY-SEVEN:
(forgery-government issued document)

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

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

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED TWO:
(id theft-uses info to obtain)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED THREE:
(id theft-poss w/ intent to use)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED FOUR:
(motor vehicle theft 2nd degree)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED FIVE:
(motor vehicle theft 3-obtain/control)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED SIX:
(id theft-uses info to obtain)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED SEVEN:
(forgery-commercial instrument)

TRUE BILL 

NO TRUE BILL _____

AS TO COUNT ONE HUNDRED EIGHT:
(motor vehicle theft 2nd degree)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED NINE:
(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TEN:
(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED ELEVEN:
(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWELVE:
(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED THIRTEEN:
(motor vehicle theft 2nd degree)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED FOURTEEN:

(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED FIFTEEN:
(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED SIXTEEN:
(id theft-poss w/ intent to use)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED SEVENTEEN:

(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED EIGHTEEN:
(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED NINETEEN:
(id theft-poss w/ intent to use)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY:
(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-ONE:

(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-TWO:

(theft-\$20,000-\$100,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-THREE:

(id theft-alter/make written inst)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-FOUR:

(forgery-government issued document)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-FIVE:

(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-SIX:

(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-SEVEN:

(theft-\$5,000-\$20,000)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-EIGHT:

(id theft-poss w/ intent to use)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED TWENTY-NINE:

(id theft-uses info to obtain)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED THIRTY:

(forgery-commercial instrument)

TRUE BILL

NO TRUE BILL

AS TO COUNT ONE HUNDRED THIRTY-ONE:

(theft-\$2,000-\$5,000)

TRUE BILL

NO TRUE BILL

I, [REDACTED], the Foreperson of the 2025 Denver County Statutory Grand Jury, do hereby swear and affirm that each and every True Bill returned in this Indictment by the 2025 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 2025 Denver County Statutory Grand Jury. The 2025 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.

[REDACTED]
Foreperson

Subscribed and sworn to before me in the County of Denver, State of Colorado, this 17th day of December, 2025.

Pamela J. Andasola
Notary Public

My commission expires:

12-12-2029

Pamela J. Andasola
Notary Public
State of Colorado
Notary ID 20214005975
Commission Expires 02/12/2029

JOHN WALSH
District Attorney

By: 

Robert Nitido, Reg. No. 43560
Denver District Attorney's Office
370 Seventeenth Street, Suite 5300
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 September 16, 2024 and December 17, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY, KEIICHI HIRAMATSU, RYAN JENNINGS, DOUGLAS JUMP, and SHAWN MCCLINTOCK, while employed by or associated with an enterprise, namely: a group of individuals associated in fact, although not a legal entity unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

The Enterprise

The enterprise alleged in this count was a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: JORDAN ASHLEY, KEIICHI HIRAMATSU, RYAN JENNINGS, DOUGLAS JUMP, SHAWN MCCLINTOCK, LINDSEY OREN, KAISHA VALENTIN, BRANDON CLEMENTS, and other persons to the Grand Jury known and 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 Jordan Ashley, the acts described in counts 18, 19, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 64, 65, 68, 69, 70, 75, 76, 95, 96, 97, 100, 102, including any lesser included offenses of these counts.

As to Keiichi Hiramatsu, the acts described in counts 22, 23, 38, 39, 55, 74, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, including any lesser included offenses of these counts.

As to Ryan Jennings, the acts described in counts 15, 42, 43, 47, 54, 56, 57, 58, 60, 61, 62, 63, 66, 67, 71, 72, 73, 74, 98, 101, including any lesser included offenses of these counts.

As to Douglas Jump, the acts described in counts 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 59, including any lesser included offenses of these counts.

As to Shawn McClintock, the acts described in counts 91, 92, 93, 94, 95, 96, 97, 99, 100, 102, 103, 104, 105, 106, 108, 109, 111, 112, 113, 114, 115, including any lesser included offenses of these counts.

The facts supporting Count 1 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. From at least September 16, 2024 through December 17, 2025, with various enterprise members joining at various times, Jordan Ashley, Keiichi Hiramatsu, Ryan Jennings, Douglas Jump, Shawn McClintock, and other persons known or unknown, including, but not limited to, Brandon Clements, Lindsey Oren, and Kaisha Valentin, were a group of individuals associated in fact, though not a legal entity, with common goals. The common goals of the enterprise were to obtain, use, and share the stolen personally identifiable information (PII) of others to commit theft and other fraud for personal and financial gain. The enterprise primarily operates in the Denver metropolitan area.
3. To facilitate theft and fraud, the enterprise utilized a variety of methods to collect personally identifiable information. Enterprise members committed burglaries and theft with the intent of stealing mail that contained financial transaction devices, identification cards, and personally identifiable information. To accomplish large-scale mail thefts, enterprise members would manufacture and trade fraudulent arrow keys to unlawfully unlock mail receptacles. Enterprise members collected lost, stolen or misplaced identification documents. Enterprise members purchased and otherwise obtained personally identifiable information from internet websites, cell phone applications, and the “dark web.” Enterprise members also manipulated the personally identifiable information of acquaintances to create fraudulent identities.
4. Enterprise members share victim PII and financial information with each other in a joint effort to gain additional PII from the internet and to exploit the information for financial benefit. During all times relevant to this indictment, enterprise members used stolen PII to create fraudulent identities. Enterprise members used the fraudulent identities to book hotel rooms, apply for credit cards, purchase vehicles from metro area car dealerships, and further other schemes. Enterprise members used and shared fraudulently obtained hotel rooms for personal lodging and as a workspace to further their criminal activity. Enterprise members also sub-leased the fraudulently obtained hotel rooms to others for profit. Enterprise members used profits from hotel rooms and other fraudulent ventures to purchase food, various items, and illicit drugs for personal use. Enterprise members also conspired to use stolen PII and fraudulent identifications to purchase goods and services for friends, acquaintances, and/or intimate partners.
5. To further the identity theft, enterprise members use cell phone applications and artificial intelligence to manipulate stolen identification cards. Enterprise members also created a sophisticated cell phone application that mimics the “myColorado app” offered by the State of Colorado that stores digital identification cards and other information that contains PII. Enterprise members act as “administrators” for the fraudulent application to create high quality, digitally forged identifications that contain a realistic looking digital hologram and a functional bar code. Enterprise members use the application to create fraudulent digital identifications that contain stolen PII with a digital image of the enterprise member’s face. Enterprise members also sell digital identification cards and access to the application to others for profit.

6. During all times relevant to this indictment, enterprise members used stolen PII to commit fraud that resulted in more than \$175,000 in losses related to vehicle, hotel room, and retail purchases.

COUNT TWO

THIRD DEGREE BURGLARY, C.R.S. 18-4-204(1), (M2) < 06044 >

On or about March 18, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, KAISHA VALENTIN unlawfully entered or broke into a vault, safe, cash register, coin vending machine, product dispenser, money depository, safety deposit box, coin telephone, coin box, or other apparatus or equipment belonging to The United States Postal Service Bear Valley with the intent to commit the crime of Identity Theft; in violation of section 18-4-204(1), C.R.S.

COUNT THREE

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

On or about March 18, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, KAISHA VALENTIN unlawfully and feloniously possessed tools, equipment, computer, computer network, scanner, printer, or other article adapted, designed, or commonly used for committing or facilitating the commission of the offense of identity theft, and intended to use the thing possessed, or knew that a person intended to use the thing possessed, in the commission of the offense of identity theft; in violation of section 18-5-905, C.R.S.

COUNT FOUR

CONSPIRACY TO COMMIT IDENTITY THEFT, C.R.S. 18-5-902(1)(c);18-2-201, (F5) < 1307JC >

On or about March 18, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, KAISHA VALENTIN, with the intent to promote or facilitate the commission of the crime of identity theft, unlawfully agreed with each other and Lindsey Oren that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-5-902(1)(c) and 18-2-201, C.R.S.

The facts supporting Counts 2 through 4 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about March 18, 2025, Douglas Jump, Kaisha Valentin, and Lindsey Oren, in association with the enterprise, unlawfully broke into the secured, drive-up mail collection box at

the United States Postal Service, Bear Valley Post Office, located at 7555 West Amherst Avenue, Denver, Colorado.

3. In communications prior to the burglary, enterprise members Kaisha Valentin and Lindsey Oren conspired to commit the burglary.

4. Enterprise members Douglas Jump, Kaisha Valentin, and Lindsey Oren utilized a forged, fabricated arrow key in their possession to enter the locked mailbox and steal mail items and packages.

5. Enterprise members Douglas Jump, Kaisha Valentin, and Lindsey Oren conspired to obtain financial devices, identification cards, and/or personally identifiable information from the stolen mail items for the purpose of committing identity theft.

6. Enterprise member Lindsey Oren knowingly provided a stolen white Chrysler Pacifica, Florida license plate 71BIYB, that was used by enterprise members to commit the burglary. The Chrysler Pacifica, owned by Avis Car Rentals, was stolen on or about February 24, 2025, and recovered on or about March 22, 2025.

COUNT FIVE

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

On or about June 09, 2025, at or triable in the City and County of Denver, State of Colorado, KAISHA VALENTIN unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained more than four grams of Methamphetamine, a schedule I or II controlled substance; in violation of section 18-18-403.5(1),(2)(a), C.R.S.

The facts supporting Count 5 are as follows:

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

2. On or about June 9, 2025, Kaisha Valentin, in association with the enterprise, knowingly and unlawfully possessed more than four grams of methamphetamine.

3. Denver Police Officers stopped enterprise member Kaisha Valentin while she was driving a green Chevrolet Tahoe, in the area of 5885 West 14th Avenue, Lakewood, Colorado.

4. Denver Police Officers arrested enterprise member Kaisha Valentin for active arrest warrants. A Denver Police Officer located a bag inside the vehicle that contained drug paraphernalia and methamphetamine.

5. The methamphetamine was submitted to the Denver Police Crime Laboratory and tested presumptively positive for the presence of methamphetamine with a net weight of 4.862 grams.

COUNT SIX

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully and feloniously possessed tools, equipment, computer, computer network, scanner, printer, or other article adapted, designed, or commonly used for committing or facilitating the commission of the offense of identity theft, and intended to use the thing possessed, or knew that a person intended to use the thing possessed, in the commission of the offense of identity theft; in violation of section 18-5-905, C.R.S.

The facts supporting Count 6 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. During the execution of a search warrant on or about May 15, 2025, Douglas Jump, in association with the enterprise, unlawfully possessed forged and fabricated United States Postal Service “arrow keys” that are used by postal employees to open mail collection boxes and other mail receptacles.
3. Enterprise member Douglas Jump possessed the “arrow keys” with the intent they be used to open mailboxes and steal mail items containing PII to further the crime of identity theft.

COUNT SEVEN

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1),(2)(a), (F4) < 0603A >

On or about November 5, 2024, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the occupied structure or building being used for the operation of a commercial business of Alta City House Apartments, located at 1801 Chestnut Pl with the intent to commit therein the crime of Identity Theft; in violation of section 18-4-203(1),(2)(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 or about November 5, 2024, Douglas Jump, in association with the enterprise, unlawfully entered into the Alta City House Apartments, an occupied structure, at 1801 Chestnut Place, Denver, Colorado and broke into the secured resident mailboxes.
3. Enterprise member Douglas Jump stole mail and packages from the mailboxes to obtain PII, identification documents, or financial devices to be used to commit the crime of identity theft.

COUNT EIGHT

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1),(2)(b)(I), (F3) < 06036 >

Between and including December 31, 2024 and January 1, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of [REDACTED] located at 4301 S Pierce St, Unit 3C with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(b)(I), C.R.S.

The facts supporting Count 8 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including December 31, 2024 and January 1, 2025, Douglas Jump, in association with the enterprise, unlawfully broke into the residence of [REDACTED] located at 4301 South Pierce Street, Unit 3C, in Denver, Colorado.
3. Once inside the residence, enterprise member Douglas Jump stole documents and identification cards containing PII related to [REDACTED] US currency, credit cards, identification documents, clothing, sports equipment, electric and manual bicycles, a US Treasury note, and other miscellaneous items with a total value of approximately \$13,300.00.

COUNT NINE

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 9 and 10 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card and credit report document with the PII of [REDACTED], a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT ELEVEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWELVE

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 11 and 12 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of digital devices that unlawfully contained a forged digital identification card and credit report document with the PII of [REDACTED] a real person.

3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.

4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT THIRTEEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT FOURTEEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT FIFTEEN

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

Between and including May 12, 2025 and May 13, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, RYAN JENNINGS 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 13 through 15 are as follows:

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

2. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of digital devices that unlawfully contained a forged digital identification card and credit report document with PII of [REDACTED] a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] along with PII of Hunter Blevins, with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.
5. Between and including May 12, 2025 and May 13, 2025, Douglas Jump and Ryan Jennings, in association with the enterprise, unlawfully used [REDACTED] identity to stay at an unidentified hotel.

COUNT SIXTEEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT SEVENTEEN

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT EIGHTEEN

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

On or about June 17, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT NINETEEN

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

On or about June 17, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 16 through 19 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with PII, specifically the driver's license number, of [REDACTED] a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] along with PII of Raymond Shampine, with a digital image of Douglas Jump's face.
4. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained two forged digital identification cards with PII, specifically the driver's license number, of [REDACTED]
5. Jordan Ashley, in association with the enterprise, unlawfully created two fraudulent Colorado digital driver's licenses containing PII of [REDACTED]
6. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT TWENTY

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWENTY-ONE

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

On or about May 15, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 20 and 21 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with PII, specifically the driver's license number, of [REDACTED] a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT TWENTY-TWO

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

Between and including January 14, 2025 and June 24, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, KEIICHI HIRAMATSU unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWENTY-THREE

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

Between and including January 14, 2025 and June 24, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP, KEIICHI HIRAMATSU with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created

by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 22 and 23 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 14, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person.
3. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED]
4. Douglas Jump and Keiichi Hiramatsu, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
5. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT TWENTY-FOUR

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWENTY-FIVE

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 24 and 25 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 14, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person and acquaintance of enterprise member Douglas Jump.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT TWENTY-SIX

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWENTY-SEVEN

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), 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. On or about January 14, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card and other data with the PII of [REDACTED] a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with an image of Douglas Jump's face.

COUNT TWENTY-EIGHT

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT TWENTY-NINE

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 28 and 29 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 14, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with PII of [REDACTED] a real person and acquaintance of enterprise member Douglas Jump.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT THIRTY

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal

identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT THIRTY-ONE

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

On or about January 14, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 30 and 31 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 14, 2025, Douglas Jump, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with PII, specifically the driver's license number, of [REDACTED] a real person.
3. Douglas Jump, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing PII of [REDACTED] with a digital image of Douglas Jump's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT THIRTY-TWO

SECOND DEGREE BURGLARY, C.R.S. 18-4-203(1),(2)(b)(I), (F3) < 06036 >

Between and including May 08, 2025 and May 09, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of [REDACTED] with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(b)(I), C.R.S.

COUNT THIRTY-THREE

MOTOR VEHICLE THEFT IN THE FIRST DEGREE, C.R.S. 18-4-409(2), (F3) < 0804Q >

Between and including May 09, 2025 and May 28, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and knowingly obtained,

exercised control over, received, or retained the motor vehicle of [REDACTED] and knew or reasonably should have known it was without authorization, or by threat or deception.

Further, on October 29, 2015, DOUGLAS JUMP was convicted of an offense involving theft of a motor vehicle in Jefferson County, in case number 15CR1845 and on November 20, 2015, DOUGLAS JUMP was convicted of an offense involving theft of a motor vehicle, in Jefferson County, in case number 14CR3301; in violation of section 18-4-409(2),(6)(a) C.R.S.

The facts supporting Counts 32 and 33 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Between and including May 8, 2025 and May 9, 2025, Douglas Jump, in association with the enterprise, unlawfully broke into the residence of [REDACTED] Street in Centennial, Colorado.
3. Once inside the residence, enterprise member Douglas Jump, along with other unidentified enterprise members, stole jewelry, collectibles, shoes, electronics, and other miscellaneous items with a total value of approximately \$200,000.00.
4. During the commission of the burglary, enterprise member Douglas Jump stole [REDACTED] silver 1992 Nissan Skyline GT-R32, chassis number [REDACTED] from the attached garage of the residence.
5. Douglas Jump, in association with the enterprise, retained possession of the stolen Nissan Skyline until it was recovered by Denver Police on May 28, 2025.
6. On October 29, 2015, Douglas Jump was convicted of Aggravated Motor Vehicle Theft in Jefferson County case 15CR1845.
7. On November 20, 2015, Douglas Jump was convicted of Aggravated Motor Vehicle Theft in Jefferson County case 14CR3301.

COUNT THIRTY-FOUR

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306, (F4) < 24051 >

Between and including May 1, 2025 and May 8, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully and feloniously attempted to influence [REDACTED] a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT THIRTY-FIVE

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

Between and including May 1, 2025 and May 8, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Medical Excuse from Work; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 34 and 35 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 1, 2025, enterprise member Douglas Jump failed to appear in the Denver District Court for a scheduled court appearance as a defendant in a criminal case.
3. On or about May 8, 2025, enterprise member Douglas Jump appeared in the Denver District Court. Douglas Jump unlawfully presented the [REDACTED] a forged medical "excuse from work" document to explain his absence on May 1, 2025.
4. The forged document, conveying enterprise member Douglas Jump's emergency medical status, was intended to influence the decisions made by the [REDACTED] in regard to Douglas Jump's case and bond status.

COUNT THIRTY-SIX

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

On or about October 23, 2024, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT THIRTY-SEVEN

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

On or about January 10, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP 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 36 and 37 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about October 23, 2024, Douglas Jump, in association with the enterprise, unlawfully used the personal identifying information of [REDACTED] a real person, to rent a storage unit from Extra Space Storage, located at 6301 West Mississippi Avenue, Lakewood, Colorado.
3. On or about January 10, 2025, enterprise member Douglas Jump unlawfully used the personal identifying information of [REDACTED] to transfer storage units at Extra Space Storage.

COUNT THIRTY-EIGHT

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

On or about May 29, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud the State of Colorado, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT THIRTY-NINE

POSSESSION OF A FORGERY DEVICE, C.R.S. 18-5-109(1)(a),(2)(a), (F5) < 10078 >

On or about May 29, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly made or possessed, with knowledge of its character, a plate, die, or other device, apparatus, equipment, or article, namely: Fraudulent My Colorado App, specifically designed for use in counterfeiting, unlawfully simulating, or otherwise forging written instruments or counterfeit marks; in violation of section 18-5-109(1)(a),(2)(a), 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 or about May 29, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully sold undercover Denver Police Detectives a fraudulent cell phone application capable of producing forged Colorado digital identification cards. Enterprise member Keiichi Hiramatsu possessed the application and digitally transferred it to Denver Police Detectives.
3. On or about May 29, 2025, enterprise member Keiichi Hiramatsu, unlawfully made a fraudulent digital identification card for undercover Denver Police Detectives. Denver Police Detectives paid enterprise member Keiichi Hiramatsu \$300.00 for his services.

4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT FORTY

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

On or about January 12, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT FORTY-ONE

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

On or about January 12, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT FORTY-TWO

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

On or about March 18, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FORTY-THREE

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

On or about April 23, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FORTY-FOUR

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

On or about May 8, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

The facts supporting Counts 40 through 44 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person.
3. On or about January 12, 2025, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Jordan Ashley's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.
5. On or about March 18, 2025, Jordan Ashley and Ryan Jennings, in association with the enterprise, unlawfully used the PII of [REDACTED] with the intent to use it for a Zelle digital payment service account.
6. On or about April 23, 2025, Jordan Ashley and Ryan Jennings, in association with the enterprise, unlawfully used the PII of [REDACTED] with the intent to book a hotel room.
7. On or about May 8, 2025, Jordan Ashley, in association with the enterprise, unlawfully used the PII of [REDACTED] to secure bail bond services through [REDACTED]

COUNT FORTY-FIVE

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

On or about June 11, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED]; in violation of section 18-5-902(1)(c), C.R.S.

COUNT FORTY-SIX

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

On or about June 11, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT FORTY-SEVEN

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

On or about May 11, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FORTY-EIGHT

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

On or about May 12, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY 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 45 through 48 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person.
3. On or about June 11, 2025, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Jordan Ashley's face.

4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

5. On or about May 9, 2025, Jordan Ashley and Ryan Jennings, in association with the enterprise, unlawfully exchanged the PII of [REDACTED] with the intent to use it for identity theft. On or about May 11, 2025, Jordan Ashley used the PII of [REDACTED] to fraudulently open a credit account at Bass Pro Shops.

6. On or about May 12, 2025, Jordan Ashley, in association with the enterprise, unlawfully used the PII of [REDACTED] to book a room at the Embassy Suites by Hilton Denver Central Park hotel.

COUNT FORTY-NINE

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

On or about September 16, 2024, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED]; in violation of section 18-5-902(1)(c), C.R.S.

COUNT FIFTY

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

On or about September 16, 2024, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Missouri Driver License, officially issued or created by State of Missouri, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT FIFTY-ONE

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

On or about October 28, 2024, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY 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 49 through 51 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED] a real person.
3. On or about September 16, 2024, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Missouri driver's license containing the PII of [REDACTED] with an image of Jordan Ashley's face.
4. On or about October 28, 2024, Jordan Ashley, in association with the enterprise, unlawfully used the PII of [REDACTED] to create a credit card authorization form with the intent of booking a room at a Comfort Inn and Suites hotel.

COUNT FIFTY-TWO

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

On or about June 8, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT FIFTY-THREE

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

On or about June 8, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 52 and 53 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital Colorado identification card, a forged social security card, and a forged Pennsylvania driver's license with the PII of [REDACTED] a real person.

3. On or about June 8, 2025, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Jordan Ashley's face.

4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

COUNT FIFTY-FOUR

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about June 17, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully 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-FIVE

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about June 24, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully 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)(a), (F4) < 1307G >

On or about June 17, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FIFTY-SEVEN

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

On or about May 25, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS 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 54 through 57 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Ryan Jennings, in association with the enterprise, was in possession of a cell phone that unlawfully contained a photo of a Colorado driver's license issued to [REDACTED], a real person. The cell phone also unlawfully contained the PII of [REDACTED]. Enterprise member Ryan Jennings possessed the PII with the intent to fraudulently book a hotel room.
3. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained the PII of [REDACTED].
4. On or about June 17, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to attempt to book a room at a Fairfield by Marriott hotel.
5. On or about May 25, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to obtain additional PII of [REDACTED] from a digital "chat bot."

COUNT FIFTY-EIGHT

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about April 6, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FIFTY-NINE

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about April 18, 2025, at or triable in the City and County of Denver, State of Colorado, DOUGLAS JUMP unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTY

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

On or about May 22, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIXTY-ONE

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

On or about June 07, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS 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 58 through 61 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Ryan Jennings, in association with the enterprise, was in possession of a cell phone that unlawfully contained a photo of a Colorado driver's license issued to [REDACTED] a real person. Enterprise member Ryan Jennings modified or accessed the photo on or about April 6, 2025, with the intent to book a hotel room or commit other fraud.
3. On or about May 15, 2025, Douglas Jump, in association with the enterprise, was in possession of a laptop computer that unlawfully contained a credit report document dated April 18, 2025 with the PII of [REDACTED]
4. On or about May 22, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to book a room at a Hilton Garden Inn hotel.
5. On or about June 7, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to book a room at a Home 2 Suites by Hilton hotel located in Aurora, Colorado.

COUNT SIXTY-TWO

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

On or about March 04, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal

identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT SIXTY-THREE

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

On or about March 04, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT SIXTY-FOUR

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

On or about March 02, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT SIXTY-FIVE

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

On or about March 02, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT SIXTY-SIX

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

On or about March 04, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIXTY-SEVEN

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

On or about February 28, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS 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 62 through 67 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Ryan Jennings, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED], a real person. The cell phone also unlawfully contained the PII of [REDACTED].
3. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED] a real person.
4. On or about March 2, 2025 and March 4, 2025, Jordan Ashley and Ryan Jennings, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with an image of Ryan Jennings' face.
5. On or about March 4, 2025, Ryan Jennings, in association with the enterprise, unlawfully used the PII of [REDACTED] to book a room at a Hampton Inn and Suites hotel.
6. On or about February 28, 2025 Ryan Jennings, in association with the enterprise, unlawfully used the PII of [REDACTED] to secure bail bond services through [REDACTED].

COUNT SIXTY-EIGHT

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

On or about March 06, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED]; in violation of section 18-5-902(1)(c), C.R.S.

COUNT SIXTY-NINE

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

On or about March 06, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT SEVENTY

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

On or about October 01, 2024, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY 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 68 through 70 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED], a real person.
3. On or about March 6, 2025, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with a digitally modified image of [REDACTED] face.
4. On or about May 3, 2024 Jordan Ashley, in association with the enterprise, unlawfully used the PII of [REDACTED] to create a Colorado driver's license containing an image of Jordan Ashley's face. On or about October 1, 2024, Jordan Ashley used the PII of [REDACTED] to apply for a Barclay's credit card.

COUNT SEVENTY-ONE

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

On or about February 19, 2021, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal

identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT SEVENTY-TWO

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

On or about February 19, 2021, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT SEVENTY-THREE

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

On or about May 19, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SEVENTY-FOUR

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

On or about April 29, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS, KEIICHI HIRAMATSU 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 71 through 74 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Ryan Jennings, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED], a real person.
3. On or about February 19, 2021, Ryan Jennings, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with an image of Ryan Jennings' face.

4. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained the PII of [REDACTED]
5. On or about May 19, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to book a room at a Hampton Inn hotel.
6. On or about April 29, 2025, Ryan Jennings and Keiichi Hiramatsu, in association with the enterprise, used the PII of [REDACTED] to commit financial fraud.

COUNT SEVENTY-FIVE

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

On or about February 26, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT SEVENTY-SIX

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

On or about February 26, 2025, at or triable in the City and County of Denver, State of Colorado, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The facts supporting Counts 75 and 76 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED] a real person.
3. On or about February 26, 2025, Jordan Ashley, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with a digitally modified image of Jordan Ashley's face.

COUNT SEVENTY-SEVEN

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

On or about June 24, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully and feloniously possessed tools, equipment, computer, computer network, scanner, printer, or other article adapted, designed, or commonly used for committing or facilitating the commission of the offense of identity theft, and intended to use the thing possessed, or knew that a person intended to use the thing possessed, in the commission of the offense of identity theft; in violation of section 18-5-905, C.R.S.

The facts supporting Count 77 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained a fraudulent application that is designed to produce forged Colorado driver's licenses and identification cards. Enterprise member Keiichi Hiramatsu intended for the application to be used to commit identity theft.

COUNT SEVENTY-EIGHT

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

On or about June 20, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED], in violation of section 18-5-902(1)(c), C.R.S.

COUNT SEVENTY-NINE

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

On or about June 20, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud [REDACTED], unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT EIGHTY

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

On or about June 20, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT EIGHTY-ONE

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

On or about June 20, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Cabela's, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT EIGHTY-TWO

THEFT, C.R.S. 18-4-401(1),(2)(e), (M1) < 08A1D >

On or about June 20, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, and knowingly, took a thing of value, namely: Credit, of Cabela's and Capital One, with the value of one thousand dollars or more but less than two thousand dollars; in violation of section 18-4-401(1),(2)(e),(6) C.R.S.

The facts supporting Counts 78 through 82 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person. The cell phone contained additional PII of [REDACTED]
3. On or about June 20, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Keiichi Hiramatsu's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

5. On or about June 20, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with an \$8,000.00 limit. The credit application was completed at the Cabela's store located at 10670 Cabela Drive in Lone Tree, Colorado.

6. On June 20, 2025 and June 21, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Cabela's/Capital One to execute transactions that totaled \$1,865.92.

COUNT EIGHTY-THREE

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

On or about April 15, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT EIGHTY-FOUR

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

On or about April 15, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT EIGHTY-FIVE

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

On or about April 15, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT EIGHTY-SIX

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

On or about April 15, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Bass Pro Shops, unlawfully, feloniously, and

falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT EIGHTY-SEVEN

THEFT, C.R.S. 18-4-401(1),(2)(e), (M1) < 08A1D >

On or about April 15, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, and knowingly, took a thing of value, namely: Credit, of Bass Pro Shops and Capital One, with the value of one thousand dollars or more but less than two thousand dollars; in violation of section 18-4-401(1),(2)(e),(6) C.R.S.

The facts supporting Counts 83 through 87 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged identification card with the PII of [REDACTED] a real person. The cell phone contained additional PII of [REDACTED]
3. On or about April 15, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] with an image of Keiichi Hiramatsu's face.
4. On or about April 15, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with a \$10,000.00 limit. The credit application was completed at the Bass Pro Shops store located at 7970 Northfield Boulevard in Denver, Colorado.
5. On April 15, 2025 and April 16, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Bass Pro Shops/Capital One to execute transactions that totaled \$1,727.12.

COUNT EIGHTY-EIGHT

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

On or about March 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT EIGHTY-NINE

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

On or about March 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT NINETY

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

On or about May 05, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU 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 88 through 90 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 24, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained an image of a forged digital identification card with the PII of [REDACTED] a real person. The cell phone contained additional PII of [REDACTED]
3. On or about March 7, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Keiichi Hiramatsu's face.
4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.
5. On or about May 5, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to obtain credit at Best Buy and Nordstrom. On or about May 5, 2025, enterprise member Keiichi Hiramatsu made purchases using the fraudulently obtained credit.

COUNT NINETY-ONE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3), (F4) < 0804P >

Between and including May 24, 2025 and June 03, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Schomp Nissan (GRY 2022 HONDA CIVIC 71653), and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT NINETY-TWO

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

On or about May 24, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK with the intent to defraud Schomp Nissan, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Vehicle Purchase Documents; in violation of section 18-5-102(1)(c), C.R.S.

COUNT NINETY-THREE

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

On or about May 24, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT NINETY-FOUR

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

On or about April 24, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT NINETY-FIVE

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

On or about May 23, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, JORDAN ASHLEY 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 91 through 95 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 24, 2025, Shawn McClintock, in association with the enterprise, unlawfully created a fraudulent Colorado driver's license containing the PII of [REDACTED] a real person, with a digitally modified image of [REDACTED] face. Enterprise member Shawn McClintock possessed the PII with the intent to defraud [REDACTED]
3. On or about May 24, 2025, enterprise member Shawn McClintock unlawfully used the PII of [REDACTED] to successfully deceive Schomp Nissan in the purchase of a grey 2022 Honda Civic SI, Colorado temporary license 7428398; VIN: 2HGFE1E55NH471653. The total invoice price was \$38,783.67. Schomp Nissan is located at 5067 South Wadsworth Avenue, Littleton, Colorado.
4. On or about May 24, 2025, enterprise member Shawn McClintock, with the intent to defraud Schomp Nissan, signed various vehicle purchase documents and financing agreements with the name and other PII of [REDACTED]
5. On or about May 23, 2025, Shawn McClintock and Jordan Ashley, in association with the enterprise, unlawfully shared and used the PII of [REDACTED] to commit financial fraud.
6. Shawn McClintock, in association with the enterprise, retained possession of the stolen Honda Civic from approximately May 25, 2025 through June 3, 2025. On or about June 3, 2025, enterprise member Shawn McClintock was present when the stolen Honda Civic was recovered by Lone Tree Police at the Best Buy, 8682 Park Meadows Center Drive, Lone Tree, Colorado.

COUNT NINETY-SIX

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

On or about May 10, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, JORDAN ASHLEY unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT NINETY-SEVEN

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

On or about May 10, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, JORDAN ASHLEY with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT NINETY-EIGHT

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

On or about May 18, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT NINETY-NINE

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

On or about April 18, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK 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 96 through 99 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 17, 2025, Jordan Ashley, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person.
3. Between and including May 23, 2025 and June 3, 2025, enterprise member Shawn McClintock also possessed the PII of [REDACTED]

4. On or about May 10, 2025, Jordan Ashley and Shawn McClintock, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Shawn McClintock's face.
5. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.
6. On or about May 18, 2025, Ryan Jennings, in association with the enterprise, unlawfully used the PII of [REDACTED] to book a room at a Hilton Garden Inn hotel.
7. On or about April 18, 2025, Shawn McClintock, in association with the enterprise, unlawfully used a fraudulently obtained credit card with the PII of [REDACTED] to make a \$24.96 purchase at a Chick-fil-A restaurant.

COUNT ONE HUNDRED

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about May 13, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, JORDAN ASHLEY unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED ONE

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

On or about May 09, 2025, at or triable in the City and County of Denver, State of Colorado, RYAN JENNINGS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED TWO

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

On or about May 14, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, JORDAN ASHLEY 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 100 through 102 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about May 13, 2025, Shawn McClintock and Jordan Ashley, in association with the enterprise, were in unlawful possession of the PII of [REDACTED] a real person. Enterprise members Shawn McClintock and Jordan Ashley possessed the PII with the intent to defraud [REDACTED]
3. On or about May 9, 2025, Ryan Jennings, in association with the enterprise, used the PII of [REDACTED] to obtain additional PII of [REDACTED] from a digital "chat bot."
4. On or about May 14, 2025, Shawn McClintock and Jordan Ashley, in association with the enterprise, unlawfully used and shared the PII of [REDACTED] with the intent of opening fraudulent credit accounts to make purchases.

COUNT ONE HUNDRED THREE

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, BRANDON CLEMENTS unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED FOUR

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3), (F4) < 0804P >

Between and including June 27, 2025 and July 07, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of The Sharpest Rides (GRY 2018 BMW 430 49713), and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT ONE HUNDRED FIVE

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

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, BRANDON CLEMENTS unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of The Sharpest Rides (GRY 2019 Ford

Mustang 17509), and knew or reasonably should have known that it was without authorization or was by threat or deception; in violation of section 18-4-409(4)(a),(6)(c), C.R.S.

COUNT ONE HUNDRED SIX

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

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, BRANDON CLEMENTS unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED SEVEN

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

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, BRANDON CLEMENTS with the intent to defraud The Sharpest Rides, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Vehicle Purchase Documents; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED EIGHT

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3), (F4) < 0804P >

Between and including June 27, 2025 and July 30, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, BRANDON CLEMENTS unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Avalanche Harley Davidson (GRY 2024 HARLEY DAVIDSON RH975 08224), and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and attempted to alter or disguise or altered or disguised the appearance of the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT ONE HUNDRED NINE

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

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK, BRANDON CLEMENTS unlawfully, feloniously, and knowingly

used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE-HUNDRED TEN

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

On or about June 27, 2025, at or triable in the City and County of Denver, State of Colorado, BRANDON CLEMENTS with the intent to defraud Avalanche Harley Davidson, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Vehicle Purchase Documents; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 103 through 110 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about June 27, 2025, Shawn McClintock and Brandon Clements, in association with the enterprise, were in unlawful possession of the PII of [REDACTED], a real person. Enterprise members Shawn McClintock and Brandon Clements possessed the PII with the intent to defraud [REDACTED]
3. On or about June 27, 2025, enterprise members Shawn McClintock and Brandon Clements unlawfully used the PII of [REDACTED] to successfully deceive The Sharpest Rides in the purchase of a grey 2018 BMW 430, Colorado temporary license 7531640, VIN: WBA4W5C55JAA49713. The total invoice price was \$25,245.76. The Sharpest Rides is located at 2250 South Tejon Street, Englewood, Colorado.
4. On or about June 27, 2025, enterprise members Shawn McClintock and Brandon Clements unlawfully used the PII of [REDACTED] to successfully deceive The Sharpest Rides in the purchase of a grey 2019 Ford Mustang, Colorado temporary license 7531643, VIN: 1FA6P8TH5K5117509. The total invoice price was \$21,942.35. The Sharpest Rides is located at 2250 South Tejon Street, Englewood, Colorado.
5. On or about June 27, 2025, enterprise member Brandon Clements, with the intent to defraud The Sharpest Rides, signed various vehicle purchase documents and financing agreements with the name and other PII of [REDACTED]
6. On or about June 27, 2025, enterprise members Shawn McClintock and Brandon Clements unlawfully used the PII of [REDACTED] to successfully deceive Avalanche Harley Davidson in the purchase of a grey 2024 Harley Davidson RH975 Nightster motorcycle, Colorado temporary

license 7534956, VIN: 1HD1ZH114RB308224. The total invoice price was \$22,462.62. Avalanche Harley Davidson is located at 18425 West Colfax Avenue, Golden, Colorado.

7. On or about June 27, 2025, enterprise member Brandon Clements, with the intent to defraud Avalanche Harley Davidson, signed various vehicle purchase documents and financing agreements with the name and other PII of [REDACTED]

8. Shawn McClintock and Brandon Clements, in association with the enterprise, retained possession of the stolen BMW 430 from approximately June 27, 2025 through July 7, 2025. On or about July 7, 2025, enterprise member Brandon Clements was present when the stolen BMW 430 was recovered by Fort Collins Police at the Home Depot, 1251 East Magnolia Court, Fort Collins, Colorado.

9. Shawn McClintock, in association with the enterprise, retained possession of the stolen Harley Davidson RH975 Nightster from approximately June 27, 2025 through July 30, 2025. On or about July 30, 2025, enterprise member Shawn McClintock painted the motorcycle to disguise it's appearance.

10. On or about July 30, 2025, enterprise member Shawn McClintock was present when Denver Police recovered the Harley Davidson RH975 Nightster at Aurora Gold Pawn located at 8030 E Mississippi Ave unit B, Denver, Colorado.

COUNT ONE HUNDRED ELEVEN

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

On or about October 06, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT ONE HUNDRED TWELVE

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

On or about October 06, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK with the intent to defraud Echo Park Automotive and [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado Temporary Identity Document, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT ONE HUNDRED THIRTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3), (F4) < 0804P >

Between and including October 06, 2025 and October 10, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Echo Park Automotive (Whi 2022 Jeep Wrangler 78396), and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT ONE HUNDRED FOURTEEN

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

On or about October 06, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED FIFTEEN

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

On or about October 06, 2025, at or triable in the City and County of Denver, State of Colorado, SHAWN MCCLINTOCK with the intent to defraud Echo Park Automotive, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Vehicle Purchase Documents; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 111 through 115 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about October 6, 2025, Shawn McClintock, in association with the enterprise, unlawfully created a fraudulent Colorado temporary driver's license containing the PII of [REDACTED] a real person, with an image of Shawn McClintock's face. Enterprise member Shawn McClintock possessed the PII, and produced the temporary driver's license, with the intent to defraud [REDACTED]
3. On or about October 6, 2025, enterprise member Shawn McClintock unlawfully used the PII of [REDACTED] to successfully deceive Echo Park Automotive in the purchase of a white

2022 Jeep Wrangler 4XE, Colorado temporary license 7860937, VIN: 1C4JJXP65NW178396. The total invoice price was \$32,844.00. Echo Park Automotive is located at 10401 East Arapahoe Road, Centennial, Colorado.

4. On or about October 6, 2025, enterprise member Shawn McClintock, with the intent to defraud Echo Park Automotive, signed various vehicle purchase documents and financing agreements with the name and other PII of [REDACTED]

5. Shawn McClintock, in association with the enterprise, retained possession of the stolen Jeep Wrangler from approximately October 6, 2025 through October 10, 2025. On or about October 10, 2025, enterprise member Shawn McClintock was present when the stolen Jeep Wrangler was recovered by police at Walgreens, 12011 East Iliff Avenue, Aurora, Colorado.

COUNT ONE HUNDRED SIXTEEN

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED SEVENTEEN

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

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED EIGHTEEN

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

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Bass Pro Shops, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED NINETEEN

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED TWENTY

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

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED TWENTY-ONE

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

On or about August 07, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Cabela's, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED TWENTY-TWO

THEFT, C.R.S. 18-4-401(1),(2)(h), (F4) < 08A1G >

Between and including August 7, 2025, and August 11, 2025 at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly, took a thing of value, namely: Credit, of Bass Pro Shops/Cabela's and Capital One, with the value of twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-401(1),(2)(h),(6) C.R.S.

The facts supporting Counts 116 through 122 are as follows:

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

2. On or about August 7, 2025, Keiichi Hiramatsu, in association with the enterprise, was in unlawful possession of the PII of [REDACTED] a real person. Enterprise member Keiichi Hiramatsu possessed the PII with the intent to defraud [REDACTED]
3. On or about August 7, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with an \$8,000.00 limit. The credit application was completed at the Bass Pro Shops store located at 7970 Northfield Boulevard in Denver, Colorado.
4. Between and including August 7, 2025 and August 9, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Bass Pro Shops/Capital One to execute transactions that totaled \$10,467.24.
5. On or about August 7, 2025, Keiichi Hiramatsu, in association with the enterprise, was in unlawful possession of the PII of [REDACTED], a real person. Enterprise member Keiichi Hiramatsu possessed the PII with the intent to defraud [REDACTED]
6. On or about August 7, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with an \$8,000.00 limit. The credit application was completed at the Cabela's store located at 14050 Lincoln Street, Thornton, Colorado.
7. Between and including August 7, 2025 and August 11, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Bass Pro Shops/Cabela's/Capital One to execute transactions that totaled \$9,675.79. The aggregated transaction authorization amount for the two fraudulent credit cards was \$20,143.03.

COUNT ONE HUNDRED TWENTY-THREE

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

On or about September 01, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of [REDACTED] in violation of section 18-5-902(1)(c), C.R.S.

COUNT ONE HUNDRED TWENTY-FOUR

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

On or about September 01, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud [REDACTED] unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: Colorado

Driver License, officially issued or created by Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT ONE HUNDRED TWENTY-FIVE

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

On or about September 01, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED TWENTY-SIX

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

On or about September 01, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Cabela's, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED TWENTY-SEVEN

THEFT, C.R.S. 18-4-401(1),(2)(g), (F5) < 08A1F >

Between and including September 01, 2025 and September 22, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly, took a thing of value, namely: Credit, of Cabela's and Capital One, with the value of five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-401(1),(2)(g),(6) C.R.S.

The facts supporting Counts 123 through 127 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 5, 2025, Keiichi Hiramatsu, in association with the enterprise, was in possession of a cell phone that unlawfully contained a forged digital identification card with the PII of [REDACTED] a real person.
3. On or about September 1, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully created a fraudulent Colorado digital driver's license containing the PII of [REDACTED] with a digital image of Keiichi Hiramatsu's face.

4. Digital Colorado driver's licenses, issued by the State of Colorado and Colorado Department of Revenue through the "myColorado" app, are recognized as official and legal identification in the State of Colorado.

5. On or about September 1, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with an \$8,000.00 limit. The credit application was completed at the Cabela's store located at 10670 Cabela Drive in Lone Tree, Colorado.

6. Between and including September 1, 2025 and September 22, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Cabela's/Capital One to execute transactions that totaled \$10,725.84.

COUNT ONE HUNDRED TWENTY-EIGHT

IDENTITY THEFT, C.R.S. 18-5-902(1)(b), (M2) < 1307M >

On or about September 22, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully and knowingly possessed the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT ONE HUNDRED TWENTY-NINE

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

On or about September 22, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT ONE HUNDRED THIRTY

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

On or about September 22, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU with the intent to defraud Macy's, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Credit Application; in violation of section 18-5-102(1)(c), C.R.S.

COUNT ONE HUNDRED THIRTY-ONE

THEFT, C.R.S. 18-4-401(1),(2)(f), (F6) < 08A1E >

On or about September 22, 2025, at or triable in the City and County of Denver, State of Colorado, KEIICHI HIRAMATSU unlawfully, feloniously, and knowingly, took a thing of value, namely: Credit, of Macy's, with the value of two thousand dollars or more but less than five thousand dollars; in violation of section 18-4-401(1),(2)(f), (6) C.R.S.

The facts supporting Counts 128 through 131 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 22, 2025, Keiichi Hiramatsu, in association with the enterprise, was in unlawful possession of the PII of [REDACTED] a real person. Enterprise member Keiichi Hiramatsu possessed the PII with the intent to defraud [REDACTED]
3. On or about September 22, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the PII of [REDACTED] to successfully apply for a credit card with a \$6,000.00 limit. The credit application was completed at the Macy's store located at 8455 Park Meadows Center Drive, Lone Tree, Colorado.
4. On September 22, 2025 and September 23, 2025, Keiichi Hiramatsu, in association with the enterprise, unlawfully used the fraudulently obtained credit card issued by Macy's to execute transactions that totaled \$2,591.42.

WITNESS LIST

[REDACTED] e 5300

[REDACTED] 0911

[REDACTED] 06

[REDACTED] 29

