

**ADAMS AFFIDAVIT V2**  
**ARREST WARRANT AFFIDAVIT**

DISTRICT/COUNTY COURT, ADAMS COUNTY, COLORADO  
AFFIDAVIT AND APPLICATION FOR ARREST WARRANT  
THE PEOPLE OF THE STATE OF COLORADO  
CASE # 15-2485

V.

Genevieve Marie Cruz 9-1-57

I, Detective Jason McDonald state under oath that I have read the criminal complaint herein filed against the above named defendant; that the allegations are true to the best of my knowledge, information and believe that the defendant committed the the offense(s) in the complaint. That the facts known to me which establish probable cause to believe that the criminal offense(s) were committed, and were committed by the above named defendant, are the following:

On 1-20-15 Aurora Police Department Officer James Gentry (7877) was dispatched to Serta Mattress at 15800 E. 40th Ave. in Aurora, Colorado, Adams County, on a complaint of possible charitable fraud. Officer Gentry completed a general offense report and on 2-3-15 your affiant, Aurora Police Department Detective Jason McDonald (22936), was assigned this case for follow up.

On 2-4-15 I went to Serta Mattress and spoke with RP/Plant Manager, Michael Mitchell 4-14-51, who advised the following:

-Serta accepts a large number of mattress returns via their warranty program and these mattresses are called, "As Is" bedding.

-"As Is" bedding is marked as such with a label and includes mattresses and box springs.

-The average value generally accepted for "As Is" bedding is \$1000 per unit.  
-Serta donates all of their "As Is" bedding to one charity, Ecumenical Refugee and Immigration Services Inc.

-Serta receives a \$35-\$65 tax write-off per unit/mattress donated.  
-The charity is located at 1600 Downing St. #400 in Denver, CO 80218.  
-The Donation Coordinator for the charity is Genevieve Cruz and she is their only point of contact with the charity.

-The mattresses are supposed to go directly to refugees when they get new housing in the Denver metro area through Ecumenical.

-Serta delivers about 85-100 mattresses to Ecumenical every 6 weeks.  
-During the summer of 2014 he became aware that some of these donated Serta mattresses were being sold on the street in Hayes, Kansas.

-A retail mattress store in Hayes, Kansas that Serta does business with called Serta and alerted them that people were selling these mattresses across the street from them in a parking lot out of the back of a rental truck, advertising the mattresses as 60% off retail.

-An employee of the mattress store looked at the tags on the mattresses for sale and saw they were made at Serta at 15800 E. 40th Ave. in Aurora, CO.

-Michael said Serta does not authorize any sales of mattresses in this manner, and suspected that these mattresses were the ones donated to Ecumenical.

-He does not know exactly how long this fraudulent mattress sales operation has been going on, or how many mattresses have been sold by these rental truck salesmen.

-He also recently became aware of some on-line advertisements where Serta mattresses are being sold out of a self-storage unit just down the street from Serta's warehouse.

-The seller named 'Lindsay' on the website 'OfferUpNow.com' states that the Serta mattresses are kept at 'Extra Space Storage' unit K-203, located at 14750 E. 40th Ave.

-The seller 'Lindsay' advertises, "Brand new Serta mattresses liquidated from Serta. From Perfect Sleepers to Eurotops, we have many to choose from. Inventory unit by I-70 & Chambers. Mattresses do not exceed \$400."

-Based on these suspicious mattress sales, Michael sent an email to Genevieve on 10-13-14 telling her that Serta was going to stop donating mattresses to Ecumenical.

-Genevieve responded with an email to Michael on 10-14-14 stating, "Laura responded back, but she says she does business with her family that have several furniture stores in Kansas. She buys from store fronts and going out of business places and sells many different mattress brands, including bedroom sets. She is not connected to us!"

-He thinks the 'Laura' mentioned in Genevieve's email is a woman that Genevieve apparently knows through the mattress/furniture industry.

I then spoke to Serta employee, Brian McCune 1-6-59, who is the driver that delivers the mattresses to Ecumenical. He advised the following:

-He has delivered numerous loads of mattresses to Ecumenical over the past year.  
-His loads have been about 85 mattresses each, which fill an entire 53' trailer.  
-Most of his loads have been delivered to the Extra Space Storage units down the street at Chambers/40th.

-A few of the loads have been delivered to Ecumenical's other storage facility at 3975 E. 56th Ave. in Commerce City, CO.

-Ecumenical's Donation Coordinator, Genevieve Cruz, has been present at all of the drop-offs and is the only person allowed to sign for each delivery of mattresses.

-One copy of each receipt is kept by Genevieve, and one copy is kept by himself, which he submits to Serta.

-Genevieve is the person who directs him to deliver to either location.

Michael said he would try to find all of the delivery receipts that Brian has submitted to Serta, showing the date and number of mattresses for each load.

On 2-5-15 I returned to Serta Mattress and contacted the Operations Manager, Tom Locke 1-21-63, who advised the following:

-About six months ago Serta had a meeting with Genevieve Cruz regarding the suspicions they had that their donated mattresses were being sold on the street.

-Genevieve assured Serta management (himself included) that their donated mattresses were not being re-sold.

-Genevieve promised Serta that she would ensure that the donated mattresses would be locked up by her personally, that she would be the sole key holder for their storage, and would be responsible for every mattress donated by Serta to Ecumenical.

-Based on this promise/assurance by Genevieve, Serta continued to donate mattresses to Ecumenical.

I then went to Extra Space Storage at 14750 E. 40th Ave. which is in the city of Aurora, state of Colorado, Adams County. I spoke with the manager, Stefanie Kennedy 6-26-68, who advised the following:

-Unit K-203 is registered to Adam Shryock 10-22-79, but it used to be registered to Genevieve Cruz 9-1-57.

-Genevieve transferred Unit K-203 to Adam on 1-8-15 because 'she didn't want her name on it anymore.'

-Adam also has Unit A-1 registered in his name.

-She described Adam and Genevieve as seemingly having a 'business relationship.'

-She once had to tell Genevieve to stop having the 53' trailer pulling into the storage lot to deliver mattresses because the trailer was too big and was blocking other units.

-Genevieve and Adam would have large amounts of mattresses delivered to their storage units and people have recently been showing up at her manager's office asking, "Where are the mattresses for sale? I'm here to buy a mattress."

-A young lady with glasses (not Genevieve) who drives a silver Jeep has been selling mattresses out of Units A-1 and K-203 recently.

I ran a NCIC/CCIC clearance on Genevieve Cruz 9-1-57 and found that she had no criminal history. In Aurora Police Department Records (PIMS) Genevieve has a home address listed as 1045 Meteor Place in Castle Rock, CO.

I ran a NCIC/CCIC clearance on Adam Shryock 10-22-79 and found that he was recently arrested by Denver PD on 1-16-15 for FTA on case 13CV32857, State of Colorado vs. Boobies Rock Inc, which was a case involving charity fraud. The Denver Sheriffs Office advised that Adam had an expected release date of 5-4-15. According to news reports by 9News and ABC-7News, Adam Shryock was arrested for running a fraudulent charity called 'Boobies Rock Inc' which raised millions of dollars for cancer charities, however, Adam was pocketing almost all of the donations himself. According to the news reports, Adam purchased a new BMW car, paid his bar tabs, maid service, and was living in a \$2 million home in Castle Rock with the 'charity' proceeds that he collected.

In Aurora Police Department Records (PIMS) Adam has a home address listed as 1045 Meteor Place in Castle Rock, CO, the same address as Genevieve Cruz. This home is listed on Zillow.com as having 4 beds/6 baths, 7071 sq ft, valued at \$2.59 million.

Adam was contacted by Aurora PD on 1-6-15 in reference to a MVT case (APD

14-48496). Adam told APD Detective Steve Elswick (21694) during this case that he operates a business called Laura Althen LLC and he buys surplus furniture and re-sells it.

I ran a Google search for 'Laura Althen LLC' and I found an internet site with this name. The company advertises itself as an 'Advertising & Marketing' company with a listed phone number of 303-434-2541. I called the phone number listed and a female answered. She identified herself as Laura Althen 8-25-73. Laura told me the following:

-She no longer runs the company 'Laura Althen LLC' because she went 'out of business.'

-Adam Shryock never operated her business, despite his claim to Detective Elswick.

-Her company did legitimate advertising and marketing for sporting/business events, not 'surplus furniture buying/selling' as Adam reported to Detective Elswick.

-She, in fact, worked for Adam doing mattress sales at his direction.

-Adam ran a company called 'SN2C' which stood for 'Say No To Cancer' and he sold mattresses as a side business.

-Adam hired her in March 2014 to sell Serta mattresses for him, which were being delivered to a self-storage site near Chambers/40th (Extra Space Storage).

-Adam told her that the Serta mattresses were coming from a woman named 'Genevieve' who ran a refugee housing organization and had ties to the mattress industry, and that all the mattresses were over-stock/surplus items authorized for re-sale at reduced prices.

-Mattresses were delivered to the self-storage units at Chambers/40th by a 53' trailer and she would see Genevieve sign for them, while Adam and herself would unload the mattresses into the storage units.

-Some (few) deliveries were made to another storage site at 3975 E. 56th Ave. in Commerce City (Ecumenical's other site).

-In the spring of 2014 she once was told by Adam to go to the storage site on 56th to pick up 20 mattresses for a 'sales trip.'

-When she arrived at the storage site, it was locked, so she called Adam for help.

-Adam told her that he would call Genevieve to get someone to unlock the site for her.

-She waited about 90 minutes and a male showed up, told her that Genevieve had sent him, and he unlocked the site for her.

-The 20 mattresses from this storage site on 56th were eventually sold, but she doesn't remember where at.

-She sold these Serta mattresses in many states on 'sales trips', including Hayes, Kansas.

-She would have mattress sales events about every other weekend and would make roughly \$1500-\$8000 in sales each time.

-She would give all the cash proceeds to Adam and he paid her a salary check every 2 weeks of approx. \$2700 (net).

-A couple times Adam would not pay her a check, but rather told her to keep \$2700 worth of the mattress sales for herself on a sales trip and to give him the remaining proceeds directly upon her return.

-She stopped working for Adam in the fall of 2014 when Adam suddenly stopped paying her.

-She had no knowledge that the Serta mattresses were actually donated by Serta to a charity (Ecumenical) and were not to be re-sold.

-Adam and Genevieve had always represented their mattress business to her as a legitimate operation.

-Lindsay Mayhall (619-867-1932) was another female employee that Adam hired to assist in the mattress sales.

I spoke to Lindsay Mayhall 2-23-77 by phone and she told me the following:

-She began working for Adam Shryock in the Spring of 2014.

-Adam hired her to do marketing/sales for his mattress business.

-Adam told her that he got 'surplus' mattresses from a woman named 'Genevieve' who ran an 'Immigration Society.'

-Adam explained to her that the Society had extra mattresses that could be sold, with the money going back to the Society.

-She believed this to be a legitimate business model.

-Adam got a truck load of mattresses from Genevieve about every 6 weeks and most loads were stored at the Extra Space Storage at 40th/Chambers.

-Adam once told her that he gave a \$5000 check to the Society for the mattresses, so she believed him to be legitimate.

-She applied for temporary sales permits in the towns that the mattresses would be sold in.

-She did on-line advertising, including setting up the "OfferUpNow.com" listing which showed the Serta mattresses for sale.

-She is the contact person on that site named 'Lindsay', she drives a silver Jeep, and she has been selling mattresses recently out of Units A-1 and K-203 at Extra Space Storage at 14750 E. 40th Ave.

-The storage units are in Adam's name and he has directed her to continue selling the mattresses, even after his arrest in January 2015.

-Adam was paying her an annual salary of \$50,000 but has not been paying her since his arrest.

-She told him she was going to file for unemployment benefits, and Adam replied that he has not been paying into unemployment for her.

-Adam told her to keep selling the mattresses and that she could keep up to \$3000 of sales for herself, then they would split sales after that 50/50.

-She has sold approximately \$2000 worth of mattresses out of Units A-1 and K-203 since Adams arrest.

Lindsay agreed to meet with me at the storage units at 14750 E. 40th Ave. and show me the mattresses. She was driving a silver Jeep Cherokee (266-YCJ) when she arrived. Lindsay had keys to the locks on the units and opened them for me. I saw 21 units/mattresses inside A-1 and roughly 80-100 units/mattresses inside K-203 (the unit was packed so full I couldn't get inside to count them all).

Many of the mattresses were labeled 'As Is' and they had 'Serta' tags on them with a manufacturing address of 15800 E. 40th Ave., Aurora, Colorado. Serta Operations Manager, Tom Locke, was present with me and he positively ID'd the mattresses and their "As Is" labels as being from Serta. I took photos of the

storage units and Lindsay gave me the locks/keys for evidence. I had the manager at Extra Space Storage, Stefanie, place new locks on the units to secure the mattresses.

I showed Lindsay a Colorado DMV mugshot of Genevieve Cruz 9-1-57 and a Denver PD mugshot of Adam Shryock 10-22-79. Lindsay positively ID'd both as, "That's Genevieve and that's Adam." Lindsay gave me some paperwork which showed some text messages she received from Adam regarding their mattress business, as well as some sales permit applications from various cities.

I went to Ecumenical Refugee and Immigration Services, Inc. at 1600 Downing St. #400 in Denver and contacted the Executive Director, Ferdi Mevlani 5-19-64, who told me the following:

-Ecumenical is a tax-exempt charitable foundation under section 501(c)(3) of the Internal Revenue Code, licensed as such since 1981.

-Ferdie provided me with documentation from the Colorado Department of Revenue and the IRS confirming this.

-He said Genevieve Cruz 9-1-57 is the Donation Coordinator/Sponsorship Director for Ecumenical.

-He said Genevieve's position is a very autonomous one, and even though he is the 'Director' of the organization, Genevieve is in charge of the entire donation side of the charity without much oversight from the rest of the organization.

-He does not keep any records of Genevieve's work, only Genevieve does.  
-He is aware that Serta donates a large amount of mattresses to Ecumenical, but Genevieve is the only one who deals with Serta and handles the delivery and storage of the mattresses.

-Any sales of these donated mattresses would be absolutely prohibited by Ecumenical, as it would violate their tax-exempt charity status and IRS laws.

-He is not aware of any donated mattresses being sold, and would certainly not condone this practice.

-The donated mattresses from Serta are to be stored at their storage site, which is at 3975 E. 56th Ave. in Commerce City, and then delivered to new housing for refugees as they open up.

-The employee at Ecumenical who is the driver of these home deliveries is Glypi



Xhofer 11-2-62, aka 'Jeff.'

-From February 2014 to February 2015 Ecumenical has received 314 refugee families for housing.

-He does not know the exact count at this time, but estimates that this would mean about 500 mattresses from Serta would have been delivered to these family's homes over the last 12 months.

-Genevieve has not given the organization any money/checks related to 'mattress sales.'

-He agreed to be present while I interviewed Genevieve in her office.

I then interviewed Genevieve Cruz 9-1-57 (ID'd by Colorado drivers license) who told me the following: (Ferdie present)

-She is the only person at Ecumenical that deals with donations, and she is the only point of contact with Serta.

-She has lived with Adam Shryock in Castle Rock since April 2014 at his house, 1045 Meteor Place. She told me her cellphone number is 720-569-3284.

-She began working with Serta in March 2014 when they started donating mattresses to Ecumenical.

-Ecumenical's storage site at 3975 E. 56th Ave. quickly filled up with mattresses, so she began renting storage units at Extra Space Storage at 14750 E. 40th Ave. to have more room to store mattresses.

-The storage units were in her name and she was paying for them out of her own pocket.

-She transferred the storage units to Adam, in his name, on 1-8-15 because Adam was a 'trusted volunteer of Ecumenical who had helped the organization in the past.'

-She had no paperwork showing what volunteer work, if any, Adam had ever done for Ecumenical (Ferdie said this would be a violation of the organization's volunteer rules).

-She admitted that this was probably a very bad business decision, to entrust all of the donated Serta mattresses worth more than \$100,000 to an individual not even associated with the organization.

-She claimed to have no knowledge of Adam's charitable fraud past, claiming she didn't know about any of the 'Boobies Rock Inc' scandal until his arrest in January.

-She said Adam would help with the storage of the mattresses from Serta, and nothing more.

-She was not aware that any of the donated mattresses were being sold anywhere, and denied any involvement in their sales, if they were in fact occurring.

-She said any sales of the donated mattresses would be unauthorized by Ecumenical and would violate their charitable foundation laws.

-She has not given the organization any money/checks from any 'mattress sales.'  
-When I confronted Genevieve about the email she received from Michael Mitchell at Serta on 10-13-14 which asked about the Serta mattresses being sold in Kansas, Genevieve said that she completed an 'internal investigation' into the matter and found no wrongdoings by anyone.

-When I asked Genevieve who 'Laura' was that she referenced in her email response to Michael Mitchell on 10-14-14, she said 'Laura' was a woman she found on FaceBook that was selling beds and furniture in Kansas, but was not associated at all with Ecumenical.

-She said she had no further information on 'Laura' and has never met her.

Genevieve's jaw literally 'dropped' and remained open and speechless when I told her that I've spoken to 'Laura' (Althen) and that she knows her (Genevieve) by name, has met her in person, has been present at the storage units at Chambers/40th when she's signed for mattress loads from Serta, and has been selling the Serta mattresses for her (Genevieve) and Adam's 'business.' Genevieve had no further comments to make regarding this investigation, except a general denial statement of, "I have never sold a mattress to anyone."

I told Genevieve that her last statement may have been the only truthful thing she's told me so far, because she in fact had others sell the mattresses 'for her.' I asked Genevieve to turn over all of the receipts of the truck loads of Serta mattresses that she has signed for, and she did. Some of the receipts had Genevieve's name and phone number listed on them (720-569-3284). The receipts she gave me showed the following:

9 total deliveries  
852 total Units/Mattresses

\$45,540 total taxable donation write-off for Serta; (\$852,000 total re-sale value of Units/Mattresses)

Ferdi advised that Genevieve was going to be placed on suspension/administrative leave, pending the outcome of this investigation.

On 2-6-15 I went to the Denver PD Jail and interviewed Adam Shryock 10-22-79. I introduced myself as Detective McDonald with the Aurora Police Department and recorded the interview on a digital recorder that was in plain view. Adam read and signed an Advisement of Rights form, agreeing to speak with me. We spoke for over three hours about this case and the following is a summary of what Adam said:

-About a week after Genevieve moved into his house in the Spring of 2014, she approached him with a business proposal to sell mattresses.

-Genevieve told him that she worked for a Refugee Housing organization that received donated mattresses from Serta that were supposed to go to refugee housing.

-Genevieve told him that the organization had a 'surplus' of mattresses, not enough storage space, and the mattresses were becoming a burden to keep hold of.

-Genevieve told him that she was authorized to sell the donated mattresses from Serta and that they would split the sales 50/50, with Genevieve's half going back to the charity as donated monies.

-He doesn't know the laws in Colorado about charities and donations, even though he's run a 'charity' in Colorado before, so he didn't know at the time that there was anything wrong with the business proposal Genevieve came to him with.

-Genevieve would often try to legitimize her authority to sell the donated mattresses by referencing her 'Agency' (for example: Genevieve would tell him, "The Agency is really proud of the work you've been doing selling mattresses," and, "The Agency needs you to sell more mattresses.")

-He began to suspect early on, however, that Genevieve was not being honest about her authority to sell the mattresses and the legitimacy/legality of their business model.

-On one of his first 'sales trips', Genevieve called him and asked how much money he made selling mattresses.

- He told Genevieve the dollar amount, and she requested that he deposit it in her personal Wells Fargo checking account.
- He told Genevieve that he would be home soon and talked her into waiting to be paid upon his return, at which time he paid her the cash that was her half.
- He suspected, and later became convinced, that Genevieve was keeping some of the money for herself and was not in fact giving all the money back to the charity.
- Despite his suspicions, he continued to sell mattresses with Genevieve for over 6 months and even hired several salespeople to help with the business.
- Some of those he hired were Lindsay [Mayhall] and Laura [Althen].
- These people were hired by him with the understanding that the Serta mattress sales were completely legitimate.
- He would be present on many occasions at Extra Space Storage where the Serta trailer would deliver the mattresses to Genevieve.
- He would assist in unloading the trailer and filling the storage units with mattresses.
- Over the entire course of doing business with Genevieve, despite their 50/50 agreement, Adam only gave Genevieve approximately \$15,000 cash from approximately \$50,000 in mattress sales.
- Adam said he was not going to report making any 'charitable donations' on his 2014 taxes because he was already in trouble for his current 'charity issues.'
- Adam also admitted to authorizing Lindsay to sell the remaining Serta mattresses from his storage Units A-1 and K-203 since his arrest in January so that she could 'pay herself' the salary she lost when he got arrested.
- I asked Adam if he ever did 'volunteer' work for the charity and he said that he never did volunteer work for Ecumenical, that he hates mattresses, and he told me bluntly that he is not a charitable person.
- Adam said he called Genevieve last night (2-5-15) because he heard from his girlfriend, Alyssa, that Genevieve had spoken to a detective [Me] and was hysterical.
- Adam said Genevieve was 'guarding' her speech and was mindful of what she said

to him by phone, probably knowing the phone call from jail was recorded.

-Adam said Genevieve pretended she didn't know Laura and said she didn't authorize anyone to sell the mattresses.

-Adam told Genevieve that he would tell the police the truth if asked about the mattress sales, and asked Genevieve, "Does your boss know what the arrangement is?"

-Adam said Genevieve did not respond and promptly hung up the phone.

-Adam said he had text messages saved on his cellphone that was in his 'prisoner property' at the Denver Jail that he wanted to show me, which were between Genevieve and himself, discussing their mattress business (we agreed to meet on 2-10-15 to view them).

Adam signed a Consent to Search and Seize form, allowing the Aurora Police Department to search and seize anything which is believed to be evidence of a crime, at the location of the storage units (A-1 and K-203) which are registered in his name at Extra Space Storage located at 14750 E. 40th Ave. I told Adam that I wanted to seize all the mattresses out of his units and return them to Ecumenical, which he agreed with.

I met Ferdi at Extra Space Storage and we unloaded all the mattresses from A-1 (21 Units/Mattresses) and K-203 (98 Units/Mattresses). I also found two sales signs in K-203, one of which advertised 'Serta mattresses 80% off.' I seized the signs and took photos of the units/mattresses.

Ecumenical driver, Glypi Xhofer 11-2-62, aka 'Jeff', loaded the mattresses to be taken back to 3975 E. 56th Ave. I asked Jeff if he was aware of the mattresses being sold and he said, "No."

On 2-10-15 I returned to the Denver Jail to view the text messages on Adam's cellphone. I first verbally advised Adam of his rights from my APD Miranda Card and he waived his rights and agreed to talk. The interview was recorded on digital recorder. Adam filled out a request form to receive his cellphone from his 'prisoner property' and it was retrieved for us by Denver Sheriff Deputies. Adam showed me numerous text messages to/from Genevieve (720-569-3284, same number Genevieve told me was hers on 2-5-15). Many of the text messages to/from Genevieve directly discuss their Serta mattress sales scheme. One text conversation in particular, from Genevieve on 10-20-14 (one week after being accused by Michael Mitchell at Serta of selling the mattresses), begins with her asking Adam, "Where are you guys selling them this weekend and next[?] It can't be in Kansas. I just got an email from Mike [Mitchell]. He doesn't know it's us yet but he said the girl was selling them

right across the street from another Serta distribution place."

Adam also showed me two photos on his cellphone that he took during 'sales trips' which show the actual Serta mattresses set up for sale. I took photos of all the relevant text messages and photos on Adam's cellphone, then it was returned to Denver Sheriff Deputies to be placed back in Adam's 'prisoner property.'

I showed Adam a Colorado DMV mugshot of Genevieve Cruz 9-1-57 and he positively ID'd her as, "That's Genevieve."

On 2-11-15 I went to Serta Mattress and contacted Plant Manager, Michael Mitchell. Michael presented me with all of the Serta delivery receipts he could find, showing the date and number of mattresses for each load to Ecumenical. Many of the receipts have Genevieve's name and phone number listed on them (720-569-3284). Michael could not find Serta's copy of the receipts from 3-4-14, 3-19-14, 4-4-14, and 4-17-14 that Genevieve had earlier provided me. Michael did, however, provide me with several receipts which Genevieve did not provide. These were: 7-25-14, 8-21-14, 9-10-14 (2 loads), 11-25-14, 12-1-14, 1-5-15 (2 loads). All had Genevieve's signature on them. All of the receipts from Serta that Michael provided showed the following:

13 total deliveries  
1272 total Units/Mattresses  
\$67,650 total taxable donation write-off for Serta; (\$1,272,000 total re-sale value of Units/Mattresses)

Serta's receipts show that Genevieve was unable to turn over records accounting for 4 additional deliveries, 420 additional Units/Mattresses, worth \$420,000 in goods.

All of the receipts combined, from Genevieve AND Serta, show the following totals:

17 total deliveries from Serta to Ecumenical between March 2014-January 2015  
1608 total Units/Mattresses = \$1,608,000 total re-sale value of Units/Mattresses

On 2-12-15 I received a phone call from Ecumenical's Board of Directors member, Frank Gale 8-15-63, who said he was contacted by Genevieve on 2-9-15. Frank said Genevieve was hysterical and reported the following to him:

-She has been selling the donated Serta mattresses for the past year.  
-She lied to the police detective [Me] that interviewed her on 2-5-15 about the matter.

-She has been giving the cash from the mattress sales to Ferdi, but has no records of any kind to show this.

-Ferdie has not been giving the money back to Ecumenical like he was supposed to.  
-All the money is now missing and unaccounted for.  
-Adam [Shryock] was helping with the mattress sales as a coordinator.

Frank also said that Genevieve sent him a text message with three photos attached. The photos were: 1) A Penske rental truck selling Serta mattresses in a parking lot. 2) Some mattresses set up in a parking lot for sale. 3) Lots of cash spread out on a bed, with Genevieve adding the caption, "First time Adam gave me money..." Frank forwarded the text message and photos to me.

I told Frank that I would ask Ferdi some follow-up questions regarding Genevieve's allegation, but that based on what I have gathered from speaking to everyone involved (including Genevieve, who lied to me), I believed that Genevieve had no credibility and was apparently trying to find a 'scapegoat' to blame for her own wrongdoings. Frank said he understood and advised that he has no problems or trust issues with Ferdi as the Executive Director.

I later when to Ecumenical and contacted their accountant, Peggy Minisini 12-20-68, who advised that she is responsible for tracking all monetary donations made to Ecumenical. Peggy advised that there have been no monetary donations ever made from any kind of mattress sales. Peggy also advised that neither Ferdi, Genevieve, or Adam Shryock have given any monetary donations to Ecumenical.

Ferdi was not in his office, so I called him and spoke to him by phone. I told Ferdi about the allegation Genevieve made to Board Member, Frank Gale, and asked him if it was true. Ferdi said that it was not true. Ferdi said that when he called Genevieve into his office on 2-6-15 to advise her of her suspension/administrative leave, Genevieve was very apologetic towards him and asked him if there was any way he could tell the police [Me] that she in fact had given some mattress sales money to the organization so that she wouldn't be in trouble.

Ferdi said that he told Genevieve, "No," and reminded her of two important things, 1) I will not lie. 2) All monetary donations go through accounting and are tracked for the IRS. Ferdi said Genevieve was then very upset when he told her to not come back to the office until the investigation was complete. Ferdi suspects that Genevieve is making the false allegation against him to find a way out of her own legal troubles.

I then went to the Denver Jail and received an audio copy (CD) of the phone call Adam made to Genevieve on 2-5-15 (phone number 720-569-3284) from Denver Sheriff Deputy Michael Billings (S08001). I listened to the phone call, which gives both parties the warning, "This phone call is recorded," at the beginning, and the conversation was consistent with Adam's account. Genevieve hung up on Adam after he asked her the question, "Your boss, he knows what I'm doing with the mattresses, right?"

I then went to Ecumenical's storage site at 3975 E. 56th Ave. and Jeff showed me all the mattresses kept there. Jeff said he moved the 119 mattresses from Extra Space Storage into this facility and it currently housed all of the donated mattresses from Serta that Ecumenical had left. I counted the units/mattresses and there were 164 total. The following are my calculations of Genevieve's/Adam's mattress sales based on all the information provided to me:

1608 total donated mattresses from Serta to Ecumenical  
-500 mattresses distributed to refugee housing, per Ferdi's estimate  
-164 mattresses remaining in Ecumenical's storage  
= 944 mattresses sold by Genevieve/Adam

These 944 'sold' mattresses plus the 119 'recovered' mattresses from Extra Space Storage that were going to be sold, equals 1,063 total 'stolen' mattresses/units. This amounts to \$1,063,000 in theft (\$1000 per unit).

Based on the foregoing facts and circumstances, there is probable cause to believe that the crime(s) of C.R.S.

6-16-111(1)(g) Charitable Fraud, class 5 Felony  
18-4-401(1)(a) Theft (\$1,000,000 and over), class 2 Felony

has/have been committed and that

Genevieve Marie Cruz 9-1-57  
committed that/those offense(s).

Request is hereby made that a warrant be issued for the arrest of the above named defendant.

I have read the foregoing statement, and the matters stated therein are true to the best of my knowledge and belief



\_\_\_\_\_  
Affiant  
SUBSCRIBED AND SWORN/AFFIRMED to before me this 17 day of Feb. 20 15

\_\_\_\_\_  
Notary

\_\_\_\_\_  
My Commission Expires  
SUBSCRIBED AND SWORN/AFFIRMED to before me this day of 20

Probable Cause for Warrantless Arrest is  Found  Not Found

\_\_\_\_\_  
Judge, Adams County