

<p>DISTRICT COURT, COUNTY OF ARAPAHOE, STATE OF COLORADO  7325 S. Potomac St.  Centennial, CO 80112</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,  v.  Defendants.  Alberto Romero (D.O.B 10-20-1995)  Alexandra Romero (D.O.B 11-05-1994)  Daniel Jamaal Manu (D.O.B 05-10-1983)  Brian Jermaine Alexander (D.O.B 08-31-1983)  Miyoshi Lee Moorer (D.O.B 01-06-1982)  Robert Lee Sanchez (D.O.B 12-28-1995)  Vincent Jr. Bernette Casey (D.O.B 04-11-1990)  Layth Mamdouh (D.O.B 12-02-1996)  Ammar Niazey (D.O.B 11-10-1990)  Walter Recinos Garcia (D.O.B 08-19-1994)  Andrew Baldwin (D.O.B 08-01-1989)  Richard Sweetman (D.O.B 12-17-1949)  Jayson King (D.O.B 02-09-1981)  Fatmir Cosic (D.O.B 11-14-1985)  Jaylen LeGrand (D.O.B 11-27-1994)  Anthony James Hagman (D.O.B 01-31-1986)  Daniel Levy (D.O.B 04-15-1985)  Gustavo Ruiz-Medrano (D.O.B 11-01-1991)  Reyna Briana Portillo (D.O.B 05-09-1996)  Brianna Cole Williams (D.O.B 09-06-1993)  Gabriel Medrano (D.O.B 10-12-1991)  Juan Antonio Chairez (D.O.B 11-30-1992)  Autry Madison Campos-Dowd (D.O.B. 03-05-1996)  James Eric Jones (D.O.B 09-30-1977)</p>	
<p>George Brauchler, 18<sup>th</sup> Judicial District Attorney  6450 S. Revere Parkway,  Centennial, CO 80111</p> <p>Christopher Gallo, Reg. No.  Deputy District Attorney, 18<sup>th</sup> Judicial District</p>	<p>Grand Jury Case No.: 17CR1</p> <p>Ctrm: 201</p>
<p><b>2017 18TH JUDICIAL DISTRICT GRAND JURY INDICTMENT</b></p>	

Of the 2017 term of the 18<sup>th</sup> Judicial District Court in the year 2017; the 2017 18<sup>th</sup> Judicial District Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT ONE:	COCCA-Pattern of Racketeering – Participation in an Enterprise, §18-17-104(3), C.R.S. (F2) <b>37284</b>
COUNT TWO:	COCCA-Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2) <b>37285</b>
COUNT THREE:	COCCA-Acquire Interest in Enterprise, §18-17-104(2) C.R.S. (F2) <b>37283</b>
COUNT FOUR:	Cultivation of Marijuana, More than Thirty Plants, §18-18-406(d)(3)(A)(1), C.R.S. (DF3) 88033
COUNT FIVE:	Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants §18-18-406(3)(A)(I) C.R.S. §18-2-201 (DF4) <b>CON</b>
COUNT SIX:	Distribution Of Marijuana (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) <b>8802P</b>
COUNT SEVEN:	Possession with Intent to Manufacture or Distribute Marijuana (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) <b>8802U</b>
COUNT: EIGHT:	Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) <b>8802Z</b>
COUNT NINE:	Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, C.R.S. §18-5-309(1)(B)(I) (F3) <b>12213</b>
COUNT TEN:	Conspiracy to Commit Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I), and §18-2-201, C.R.S. (F4) <b>CON</b>
COUNT ELEVEN:	Keeping Property for Unlawful Distribution of Controlled Substances, C.R.S. 18-18-411(1) (DM1) <b>33514</b>
COUNT TWELVE:	Maintaining Property For Unlawful Manufacturing Of Controlled Substances, C.R.S. 18-18-411(2)(a) (DM1) <b>33515</b>
COUNT THIRTEEN:	Managing or Controlling Property for Manufacture of Controlled Substances, §18-18-411(2)(B), C.R.S. (DM1) <b>35516</b>
COUNT FOURTEEN:	Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1), C.R.S. (F5) <b>40021</b>
COUNT FIFTEEN:	Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1) and §18-2-201, C.R.S. (F6) <b>CON</b>
COUNT SIXTEEN:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) <b>24051</b>
COUNT SEVENTEEN:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) <b>24051</b>
COUNT EIGHTEEN:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) <b>24051</b>
COUNT NINETEEN:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) <b>24051</b>
COUNT TWENTY	Special Offender-Possessed deadly weapon §18-18-407(1)(d), C.R.S. (DF1)

**INDEX OF DEFENDANTS**

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Walter Recinos Garcia	1, 2, 6, 7, 8, 9, 10, 14, 15
Andrew Baldwin	1, 2, 6, 7, 8, 9, 10, 14, 15
Richard Sweetman	1, 2, 6, 7, 8, 9, 10, 14, 15
Jayson King	1, 2, 6, 7, 8, 9, 10, 14, 15
Fatmir Cosic	1, 2, 6, 7, 8, 9, 10, 14, 15
Jaylen LeGrand	1, 2, 6, 7, 8, 9, 10, 14, 15
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Gabriel Medrano	1, 2, 6, 7, 8, 9, 10, 14, 15
Juan Antonio Chairez	1, 2, 6, 7, 8, 9, 10, 14, 15
Autry Campos-Dowd	1, 2, 6, 7, 8, 9, 10, 14, 15
James Jones	1, 2, 6, 7, 8, 9, 10, 14, 15

## COUNT 1

### **Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering- Participation in Enterprise, §18-17-104(3) and §18-17-105, C.R.S. (F2) 37284**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorer, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Layth Mamdouh, Ammar Niazey, Walter Recinos Garcia, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury, acting in any combination of 2 or more persons, 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 §18-17-104(3) and §18-17-105, C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.

## COUNT 2

### **Violation of the Colorado Organized Crime Control Act – Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2) 37285**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorer, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Layth Mamdouh, Ammar Niazey, Walter Recinos Garcia, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones and others known and unknown to the Grand Jury, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3”, acting in any combination of 2 or more persons, did unlawfully, knowingly, and feloniously conspire to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity in violation of C.R.S. §18-17-104(4) and §18-17-104(3), C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.

## COUNT 3

### **Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering – Acquire Interest in Enterprise, §18-17-104(2) C.R.S. (F2) 37283**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury, acting in any combination of 2 or more persons, did unlawfully, feloniously, and knowingly acquired or maintained, directly or indirectly, an interest in or control of an enterprise or real property,

namely: 7471 Eudora Way, Centennial, Colorado 80122 and 7016 S. Dahlia Street, Centennial, Colorado 80122 through a pattern of racketeering activity or through the collection of an unlawful debt; in violation of §18-17-104(2), C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Counts One, Two and Three were committed in the following manner:

### The Enterprise

The enterprise alleged in Counts One, Two and Three consisted of a groups of individuals, associated in fact, and multiple legal entities. The enterprise included, the following associated in fact individuals, a group of individuals, along with legal entities and/or other entities:

Alberto Romero, Alexandra Romero ,Daniel Jamaal Manu , Brian Jermaine Alexander ,Miyoshi Lee Moorer , Robert Lee Sanchez ,Vincent Jr. Bernette Casey , Layth Mamdouh ,Ammar Niazey ,Walter Recinos Garcia , Andrew Baldwin ,Richard Sweetman , Jayson King ,Fatmir Cosic, Jaylen Grand ,Anthony James Hagman ,Daniel Levy ,Gustavo Ruiz-Medrano , Reyna Briana Portillo, Brianna Cole Williams ,Gabriel Medrano, Juan Antonio Chairez , Autry Campos-Dowd, James Jones and others both known and unknown to the Grand Jury, who were associated from time to time in the racketeering activity related to the conduct of the enterprise.

In general the enterprise members' roles<sup>1</sup> were as follows:

Anthony Hagman- A member of the enterprise, who operated two known marijuana cultivation facilities/grow houses, including but not limited to operations out of the following locations: 7471 Eudora Way, Centennial, Colorado 80122 and 7016 S. Dahlia Street, Centennial, Colorado 80122. This individual conspired with other members of the enterprise to coordinate distribution of marijuana with the ultimate destination being out of state locations. This individual also participated in money laundering for the enterprise by receiving monies for marijuana and reinvesting proceeds for the ongoing nature of the grow operations. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Daniel Levy – A person who acquired and resided in the residence of 7016 S. Dahlia St, Centennial, Colorado 80122 , assisting in allowing Anthony Hagman to operate unlicensed marijuana cultivation facilities/grow houses. This individual agreed to facilitate the unlicensed grow that cultivated marijuana that was later distributed to the enterprise, which was later sold to out of state buyers. This individual agreed to take a percentage of monies in order to allow Anthony Hagman, a member of the enterprise, to cultivate marijuana that eventually was distributed illegally to out of state buyers.

Alberto Romero –An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown

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<sup>1</sup> The descriptions of enterprise members' roles are grouped together for convenience of the reader.

marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Alexandra Romero –An out of state purchaser and sister of Alberto Romero, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Daniel Jamaal Manu–An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Georgia. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Brian Jermaine Alexander –An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of North Carolina. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Miyoshi Lee Moorer –An out of state purchaser, and associate to Brian Alexander, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of North Carolina. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Vincent Jr Bernette Casey –An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Tennessee. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Layth Mamdouh –An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of New York. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Ammar Niazey –An out of state purchaser, and associate of Layth Mamdouh who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of New York. This individual also participated in money laundering by conspiring to and or actually transporting,

transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Andrew Baldwin –An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Iowa. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Richard Sweetman –An out of state purchaser, and associate of Andrew Baldwin, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Iowa. Specifically this individual worked under Andrew Baldwin and Jayson King as a purchaser and transporter of the illegal marijuana sold and transported across state lines This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Jayson King –An out of state purchaser, and associate of Andrew Baldwin, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Iowa. Specifically this individual worked under Andrew Baldwin as a purchaser and transporter of the illegal marijuana sold and transported across state lines This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Fatmir Cosic–An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Jaylen Grand–An out of state purchaser, and associate of Fatmir Cosic, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Fatmir Cosic–An out of state purchaser, and associate of Andrew Baldwin, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Gustavo Ruiz-Medrano–An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring

monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Reyna Brianna Portillo—An out of state purchaser, and girlfriend of Gustavo Ruiz-Medrano, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in her home state of Texas. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Brianna Cole Williams—An out of state purchaser, who is an associate of Gustavo Ruiz-Medrano, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in her home state of Texas. Specifically this individual worked under Gustavo Ruiz-Medrano as a purchaser and transporter of the illegal marijuana sold and transported across state lines. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Gabriel Medrano—An out of state purchaser, who is an associate of Gustavo Ruiz-Medrano, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in her home state of Texas. Specifically this individual worked under Gustavo Ruiz-Medrano as a purchaser and transporter of the illegal marijuana sold and transported across state lines. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Juan Antonio Chairez—An out of state purchaser, who is an associate of Gustavo Ruiz-Medrano, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. Specifically this individual worked under Gustavo Ruiz-Medrano as a purchaser and transporter of the illegal marijuana sold and transported across state lines. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

Autry Campos-Dowd—An out of state purchaser, who is an associate of Gustavo Ruiz-Medrano, who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of Texas. Specifically this individual worked under Gustavo Ruiz-Medrano as a purchaser and transporter of the illegal marijuana sold and transported across state lines. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense.

James Jones

An out of state purchaser who purchased marijuana from other members of the enterprise and transported marijuana across state lines to distribute the Colorado grown marijuana in his home state of South Carolina. This individual opened up a P.O. Box in order to illegally send

money to members of the enterprise, and in return received marijuana mailed to him for monies he sent. This individual also participated in money laundering by conspiring to and or actually transporting, transmitting, or transferring monetary instruments or moneys, with the intent to promote the commission of a criminal offense

The above persons and entities that associated with the enterprise, and the enterprise itself, engaged in a scheme including: receiving, buying, possessing, selling, dealing, cultivating and/or distributing marijuana in Colorado and other states including Texas, North Carolina, Tennessee, New York, Iowa, Georgia, and Kansas, while simultaneously engaging in tax evasion, money laundering, failing to pay over taxes and attempting to influence public servants through deceit.

Members of the enterprise/DTO cultivated most of their marijuana at growhouses located at the following addresses: 14583 East Purdue Place, 12026 North 3rd Street, 27100 Pine Vista Circle, 20449 East Linvale Place, and 6627 South Killarney Court. In essence, the enterprise evolved into an organized distribution ring.

#### Pattern of Racketeering Activity

For purposes of Counts One, Two and Three:

Alberto Romero, Alexandra Romero ,Daniel Jamaal Manu , Brian Jermaine Alexander ,Miyoshi Lee Moorier , Robert Lee Sanchez ,Vincent Jr. Bernette Casey , Layth Mamdouh ,Ammar Niazey ,Walter Recinos Garcia , Andrew Baldwin ,Richard Sweetman , Jayson King ,Fatmir Cosic, Jaylen Grand ,Anthony James Hagman ,Daniel Levy ,Gustavo Ruiz-Medrano , Reyna Briana Portillo, Brianna Cole Williams ,Gabriel Medrano, Juan Antonio Chairez , Autry Campos-Dowd, James Jones, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury; directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, and any lesser included offenses as permitted in §18-17-103, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Cultivation of Marijuana; Conspiracy to Commit Cultivation of Marijuana Distribution of Marijuana; Conspiracy to Distribute or Possess with Intent to Manufacture or Distribute Marijuana; Possession with Intent to Manufacture or Distribute Marijuana, Money Laundering; Evasion of Taxes Administered by the Colorado Department of Revenue; Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue; Attempt To Influence a Public Servant; Keeping Property for Unlawful Distribution of Controlled Substances; Maintaining Property for Manufacture of Controlled Substances; Managing or Controlling Property for Manufacture of Controlled Substances; And the Predicate Acts of: Unlawful Use of a Communications Facility and Possession of Marijuana with Intent to Distribute, Level 2/Drug/Felony, Felony Penalty Section: K.S.A. 21-6804

#### RACKETEERING ACTIVITY

The acts of racketeering activity that the above named persons and/or entities committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated

another person to commit, consist of the following predicate acts, including any lesser included offenses permitted to be used as predicates under this statute:

Counts Four through Twenty and the other identified Predicate Act(s) set forth the essential relevant acts of racketeering and are incorporated in these Counts One, Two and Three by this reference. The relevant acts of racketeering activity include any lesser included offenses of Counts Four through Twenty and the other identified Predicate Acts.

#### **COUNT 4**

##### **Cultivation of Marijuana, More than Thirty Plants §18-18-406(d)(3)(A)(1), C.R.S. (DF3) 88033**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy and others known and unknown to the Grand Jury unlawfully, feloniously, and knowingly cultivated, grew, or produced marijuana plants, or allowed marijuana plants to be cultivated, grown, or produced on land owned, occupied, or controlled by the defendants. Further, the number of marijuana plants was thirty or more; in violation of §18-18-406(7.5)(c), C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

#### **COUNT 5**

##### **Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants §18-18-406(3)(A)(I) and §18-2-201, C.R.S. (DF4) CON**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury with the intent to promote or facilitate the commission of the crime of Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), unlawfully and feloniously agreed with one another and persons known to the Grand Jury 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 §18-18-406(7.5)(c) and §18-2-201, C.R.S. (F5), and against the peace and dignity of the People of the State of Colorado.

#### **COUNT 6**

##### **Distribution Of Marijuana (50 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) 8802P**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorner, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Walter Recinos Garcia, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana

Portillo, Brianna Cole Williams ,Gabriel Medrano, Juan Antonio Chairez , Autry Campos-Dowd, James Jones and others known and unknown to the Grand Jury unlawfully, feloniously, and knowingly sold or distributed, or attempted to sell or distribute marijuana. Further, the amount of marijuana was more than fifty pounds, in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 7**

#### **Possession with Intent to Manufacture or Distribute Marijuana (50 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) 8802U**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero ,Daniel Jamaal Manu , Brian Jermaine Alexander ,Miyoshi Lee Moorer , Robert Lee Sanchez ,Vincent Jr. Bernette Casey ,Walter Recinos Garcia , Andrew Baldwin ,Richard Sweetman , Jayson King ,Fatmir Cosic, Jaylen Grand ,Anthony James Hagman ,Daniel Levy ,Gustavo Ruiz-Medrano , Reyna Briana Portillo, Brianna Cole Williams ,Gabriel Medrano, Juan Antonio Chairez , Autry Campos-Dowd, James Jones and others known and unknown to the Grand Jury unlawfully, feloniously, and knowingly possessed, or attempted to possess, with intent to manufacture, sell or distribute, marijuana. Further, the amount of marijuana was more than fifty pounds; in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 8**

#### **Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) 8802Z**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero ,Daniel Jamaal Manu , Brian Jermaine Alexander ,Miyoshi Lee Moorer , Robert Lee Sanchez ,Vincent Jr. Bernette Casey ,Walter Recinos Garcia , Andrew Baldwin ,Richard Sweetman , Jayson King ,Fatmir Cosic, Jaylen Grand ,Anthony James Hagman ,Daniel Levy ,Gustavo Ruiz-Medrano , Reyna Briana Portillo, Brianna Cole Williams ,Gabriel Medrano, Juan Antonio Chairez , Autry Campos-Dowd, James Jones, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury unlawfully, feloniously, and knowingly conspired with one another and with a person or persons known and unknown to the Grand Jury, to sell, distribute, or possess with intent to manufacture, sell or distribute marijuana. Further, the amount of marijuana was more than fifty pounds in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 9**

#### **Money Laundering – Transfer Monetary Instrument with Intent to**

**Promote Crime, §18-5-309(1)(B)(I), C.R.S. (F3) 12213**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorner, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Walter Recinos Garcia, Layth Mamdouh, Ammar Niazey, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones and others known and unknown to the Grand Jury, unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, in violation of §18-5-309(1)(B)(I), C.R.S. (F3) and against the peace and dignity of the People of the State of Colorado.

**COUNT 10**

**Conspiracy to Commit Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I) and §18-2-201, C.R.S. (F4) CON**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorner, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Walter Recinos Garcia, Layth Mamdouh, Ammar Niazey, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury, with the intent to promote or facilitate the commission of the crime of Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(B)(I) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

**COUNT 11**

**Keeping Property for Unlawful Distribution of Controlled Substances, §18-18-411(1), C.R.S. (DM1) 33514**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy and others known and unknown to the Grand Jury, knowingly or intentionally kept, maintained, controlled, rented, leased, or made available for use a store, shop, warehouse, dwelling, building, vehicle, vessel, aircraft, room, enclosure, or other structure or place, which the defendant knew was resorted to for the purpose of keeping

for distribution, transporting for distribution, or distribution of a controlled substance; in violation of §18-18-411(1), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 12**

#### **Maintaining Property For Unlawful Manufacturing Of Controlled Substances, §18-18-411(2)(a), C.R.S. (DM1) 33515**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy and others known and unknown to the Grand Jury, knowingly or intentionally opened or maintained a place which the defendant knew was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(a), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 13**

#### **Managing or Controlling Property for Manufacture of Controlled Substances, §18-18-411(2)(B), C.R.S. (DM1) 35516**

On or about and between January 1, 2016 and March 2nd, 2017, in and triable in the State of Colorado, Anthony Hagman, Daniel Levy and others known and unknown to the Grand Jury unlawfully managed or controlled a building, room, or enclosure as an owner, lessee, agent, employee, or mortgagee and knowingly or intentionally rented, leased, or made it available for use, and the defendant knew it was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(B), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 14**

#### **Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1), C.R.S. (F5) 40021**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorer, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Walter Recinos Garcia, Layth Mamdouh, Ammar Niazey, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones and others known and unknown to the Grand Jury did unlawfully, feloniously and willfully attempt to evade and defeat a tax administered by the Colorado Department of Revenue, or a payment thereof namely, state marijuana excise tax, in violation of §39-21-118(1), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 15**

#### **Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1) and §18-2-201, C.R.S. (F6) CON**

On or about and between June 1<sup>st</sup>, 2015, and April 29th, 2017, in and triable in the State of Colorado, Alberto Romero, Alexandra Romero, Daniel Jamaal Manu, Brian Jermaine Alexander, Miyoshi Lee Moorer, Robert Lee Sanchez, Vincent Jr. Bernette Casey, Walter Recinos Garcia, Layth Mamdouh, Ammar Niazey, Andrew Baldwin, Richard Sweetman, Jayson King, Fatmir Cosic, Jaylen Grand, Anthony James Hagman, Daniel Levy, Gustavo Ruiz-Medrano, Reyna Briana Portillo, Brianna Cole Williams, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd, James Jones, “Co-Conspirator 1,” “Co-Conspirator 2,” “Co-Conspirator 3,” and others known and unknown to the Grand Jury with the intent to promote or facilitate the commission of the crime of Evasion of Taxes Administered by the Colorado Department of Revenue, unlawfully and feloniously agreed with one another 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 §39-21-118(1) and §18-2-201, C.R.S. (F6), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 16**

#### **Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051**

On or about March 7<sup>th</sup> 2017, in and triable in the State of Colorado, Brian Jermaine Alexander, unlawfully and feloniously attempted to influence Castle Rock Police Department Detective Mark Galvan, who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servants’ decisions, votes, opinions, or actions concerning a Co-conspirator which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

### **COUNT 17**

#### **Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051**

On or about March 7<sup>th</sup> 2017, in and triable in the State of Colorado, Miyoshi Moorer, unlawfully and feloniously attempted to influence Parker Police Department Detective Cleveland Holmes, who is 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 §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

**COUNT 18**

**Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051**

On or about March 7<sup>th</sup> 2017, in and triable in the State of Colorado, Robert Lee Sanchez, unlawfully and feloniously attempted to influence Douglas County Sheriff's Office Detective Zach Romberger and Douglas County Sheriff's Office Detective Charles Nunley, who are public servants, 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 §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

**COUNT 19**

**Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051**

On or about March 8<sup>th</sup> 2017, in and triable in the State of Colorado, Alberto Romero, unlawfully and feloniously attempted to influence Parker Police Department Detective Holmes who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servants' decisions, votes, opinions, or actions concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.'

**COUNT 20**

**Special Offender, §18-8-407 (D)(I), C.R.S (DF1)**

On Tuesday March 7<sup>th</sup>, 2017, in and triable in the State of Colorado, Alberto Romero, unlawfully and feloniously possessed on his person or within his or her immediate reach, a deadly weapon (handgun) as defined in section 18-1-901 (3) (e) at the time of the commission of a violation, in violation of 18-18-407, C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.'

### **PREDICATE ACT 1**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 2<sup>nd</sup> 2017, 17:35 MST, in and triable in the State of Colorado, Alberto Romero, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 2**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 4<sup>th</sup> 2017, 12:55 AM, in and triable in the State of Colorado, Alberto Romero, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 3**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 7<sup>th</sup> 2017, 10:00 AM MST and 11:50 AM MST, in and triable in the State of Colorado, Alberto Romero, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 4**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about September 15<sup>th</sup> 2016, 10:37 AM MST, in and triable in the State of Colorado, Daniel Manu, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21

U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 5**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 2<sup>nd</sup> 2017 around 10:52 AM MST, in and triable in the State of Colorado, Daniel Manu, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 6**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 5<sup>th</sup> 2017, around 7:20 PM MST and 2:34 PM MST, in and triable in the State of Colorado, Daniel Manu, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 7**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 7<sup>th</sup> 2017, 5:41 AM , 9:57 AM MST and 10:15 AM MST, in and triable in the State of Colorado, Daniel Manu, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 8**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about January 24<sup>th</sup> , 2017 at 4:32 PM MST, in and triable in the State of Colorado, Brian Alexander, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute

a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 9**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about January 24<sup>th</sup>, 2017 between 11:18 AM MST and 1:13 PM MST, in and triable in the State of Colorado, Brian Alexander, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 10**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about January 26<sup>th</sup> 2017, between 2:21 PM MST and 2:27 PM MST, in and triable in the State of Colorado, Brian Alexander, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 11**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 6<sup>th</sup> 2017, between 4:41 PM MST and 7:57 PM MST, in and triable in the State of Colorado, Brian Alexander, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 12**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 7<sup>th</sup> 2017, between 1:31 PM MST and 6:04 PM MST, in and triable in the State of Colorado, Brian Alexander, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the

commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 13**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 2<sup>nd</sup> 2017, between 1:24 PM MST and 1:37 PM MST, in and triable in the State of Colorado, Vincent Casey, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 14**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 5<sup>th</sup> 2017, between 1:53 AM MST and 11:15 PM MST, in and triable in the State of Colorado, Vincent Casey, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 15**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 7<sup>th</sup> 2017, between 8:45 AM MST and 10:12 PM MST, in and triable in the State of Colorado, Vincent Casey, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 16**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about March 8<sup>th</sup> 2017, between 10:45 AM MST and 11:29 AM MST, in and triable in the State of Colorado, Vincent Casey, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 17**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or between January 23<sup>rd</sup> 2017 4:24 PM MST and January 24<sup>th</sup> 2017, 11:56 AM MST, in and triable in the State of Colorado, Layth Mamdouh, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 18**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or between March 2<sup>nd</sup> 2017, 10:32 AM MST and March 6<sup>th</sup> 2017, 1:32 PM MST, in and triable in the State of Colorado, Layth Mamdouh, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

### **PREDICATE ACT 19**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or between March 10<sup>th</sup> 2017, 3:03 PM MST and March 20<sup>th</sup> 2017, 10:36 PM MST, in and triable in the State of Colorado, Layth Mamdouh, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance,

possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 20**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On March 22<sup>nd</sup> 2017, between 12:35 PM MST and 2:33 PM MST, in and triable in the State of Colorado, Layth Mamdouh, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 21**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On December 15<sup>th</sup> 2016 4:27 PM MST and December 19<sup>th</sup> 2016 1:31 PM MST, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 22**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On December 20<sup>th</sup> 2016 2:15 PM MST, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 23**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On and between December 23<sup>rd</sup> 2016 11:58 PM MST , December 31<sup>st</sup>, 2016 6:27 PM MST, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 24**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On January 2<sup>nd</sup> 2017, 7:56 PM MST , in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 25**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On and between January 8<sup>th</sup> 2017 3:17 PM MST and January 28<sup>th</sup> 2017, 6:58 PM, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 26**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On April 6<sup>th</sup> 2017, 9:51 PM MST, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 27**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On April 10<sup>th</sup> 2017, between 3:21 PM MST and April 10<sup>th</sup> 2017, 9:02 PM MST, in and triable in the State of Colorado, Andrew Baldwin, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 28**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 10<sup>th</sup> 2017, 4:08 PM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 29**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 11<sup>th</sup> 2017, 10:25 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 30**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 11<sup>th</sup> 2017, 10:25 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 31**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 11<sup>th</sup> 2017, 10:25 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 32**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 12<sup>th</sup> 2017, 11:23 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 33**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 22<sup>nd</sup> 2017, 1:16 PM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 34**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 23<sup>rd</sup> 2017, 6:44 PM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 35**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On February 24th 2017, 9:49 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 36**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On March 3rd 2017, 7:37 PM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 37**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On March 6<sup>th</sup> 2017, 5:49 PM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 38**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On March 8<sup>th</sup> 2017, 9:31 AM MST, in and triable in the State of Colorado, Robert Sanchez, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 39**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On March 29<sup>th</sup> 2017, 6:44PM MST, in and triable in the State of Colorado, Fatmir Cosic, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 40**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On April 6<sup>th</sup> 2017, 1:14 PM MST, in and triable in the State of Colorado, Fatmir Cosic, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

**PREDICATE ACT 41**

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On and between April 27<sup>th</sup> 2017, 2:47 PM MST, and April 28<sup>th</sup> 2017 4:46 PM MST in and triable in the State of Colorado, Fatmir Cosic, did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. §843.

## **Grand Jury Exhibit 2**

### **Executive Summary of Investigation- “The Apprentice”**

Starting in January of 2014 the State of Colorado enacted a marijuana excise tax. Retail marijuana became subject to a 15% excise tax based on the average market price of retail marijuana.

A review of the Colorado Department of Revenue Marijuana Enforcement Division records indicated none of the addresses associated with or the individuals involved in the enterprise (including those charged above) possessed marijuana licensure (other than “red cards”) associated with licensed grows of any kind.

On April 1<sup>st</sup> 2016 Detective Galvan was contacted by Greenwood Village PD (GWVPD) regarding a subject who was in custody wanting to provide information about a large scale marijuana operation in Douglas County. The male subject, hereafter, referred to as CI 16-103 was arrested after agreeing to sell marijuana via craigslist to an undercover Officer from the GWVPD. Upon contact with CI 16-103, he was found to be in possession of ecstasy as well.

Detective Galvan responded and spoke with CI 16-103 about the information he had, and learned the following information:

Approximately four to five months ago he began working with two individuals he has known for several years, including having a friendship with these individuals. CI 16-103 was in need of money and the two individuals told him they could help him earn money. The two individuals were identified as Co-conspirator 1 and Co-conspirator 2.

Co-conspirator 1 and Co-conspirator 2 grow and sell marijuana in Douglas County and have been doing so for almost a year. The CI explained that selling marijuana is their main source of income. Co-conspirator 1 and Co-conspirator 2 have started by placing ads on craigslist in order to sell their marijuana. They agreed to let CI 16-103 take over selling small quantities of the marijuana via craigslist.

For the first month Co-conspirator 1 would give CI 16-103 a quarter pound of marijuana and Co-conspirator 1 would call CI 16-103 to tell him where to meet the buyer. Co-conspirator 1 would receive the call after posting the AD and tell CI 16-103 how much marijuana was being sold and where CI 16-103 needed to meet the buyer. CI 16-103 would meet Co-conspirator 1 and Co-conspirator 2 at an apartment (3450 #24 Copper Canyon apartments, located in Douglas County) and pick up his supply of marijuana to sell.

CI 16-103 said that this apartment was not lived in and was only used as their “stash house”<sup>2</sup>, where they kept the marijuana product ready for sale. CI 16-103 stated that at the stash house there is a male named “shadow” (identified as Co-conspirator 3), that stays there during the days to watch over the marijuana. CI 16-103 stated that the stash house contained a money counter, baggies and other marijuana packaging stuff.

At any given time they had multiple pounds inside the apartment (10lbs plus). CI 16-103 stated that after about 1 month of selling marijuana for Co-conspirator 1 and Co-conspirator 2, that Co-conspirator 1 finally just gave CI 16-103 a burner phone<sup>3</sup> used to make and receive phone calls from the craigslist buyers. CI 16-103 was then instructed to begin placing his own ads. CI 16-103 said he would get a quarter pound (QP) fronted to him at \$550 a QP, and after selling the marijuana he would return with the money, and again they would front him with another QP. CI 16-103 would only deal small quantities and was told if a customer wanted larger quantities to “feel” them out and send them to Co-conspirator 1 or Co-conspirator 2 if he thought they were good.

CI 16-103 said that Co-conspirator 1 and Co-conspirator 2 referred to a pound by saying units. CI 16-103 said that persons who purchased large amounts of marijuana would meet Co-conspirator 1 and Co-conspirator 2, at a location near the stash house and or at the stash house. Co-conspirator 1 and Co-conspirator 2 would typically bring samples of the marijuana product they carried, from high grade to low grade, and usually had 8 or more strains.

CI 16-103 explained that the buyer would then select the type and amount of marijuana he/she wanted and would be told to meet at a new location with the money a short time later. Sometimes they would let the buyer come to the stash house.

CI 16-103 stated that he has been present with Co-conspirator 1 and Co-conspirator 2 when they conducted sales of large amounts of marijuana. CI 16-103 said that Co-conspirator 2 and Co-conspirator 1 instructed him to only send those people who are from out of state; this was to prevent a robbery and to be able to charge higher prices for out of state buyers.

Detective Galvan is aware that this has become a common trend in the black market for marijuana sales. Out of state buyers will usually pay more for marijuana, as they can return to their home state and sell the marijuana for nearly double the amount they paid.

CI 16-103 explained that the way the buyers were screened as being out of state buyers, was by the buyer’s area code from the phone number they used.

CI 16-103 started only sending people who he thought were from out of state wanting a pound or more. CI 16-103 says he would send multiple large quantity buyers to Co-

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<sup>2</sup> Stash house is a house used to store illegals items, commonly drugs.

<sup>3</sup> A burner phone is a street term commonly used when referring to a pre-paid phone that has no subscriber information and is purchased in order to avoid getting caught in illegal activities.

conspirator 1 and Co-conspirator 2, and that sometimes those same buyers would purchase large quantities from Co-conspirator 1 and Co-conspirator 2 multiple times a month. CI 16-103 knew that buyers would mostly drive in State for one day and pick up and take back to their perspective state. CI 16-103 said he knew this because the buyers would tell him.

In addition, CI 16-103 stated that Co-conspirator 2 was very surveillance conscious and would check his surroundings to make sure he wasn't followed. CI 16-103 said that often times he knows that Co-conspirator 2 will rent cars when conducting deals with new customers so they have no way of identifying him. CI 16-103 said that the rental car changes for each deal, and they are usually higher end rental vehicles.

CI 16-103 would get a small amount of \$20 for referring people to Co-conspirator 2 and Co-conspirator 1 from Craigslist. CI 16-103 said that Co-conspirator 1 and Co-conspirator 2 paid for the burner phone he had. They give him a \$45 card to put minutes on each month. CI 16-103 said that Co-conspirator 2 and Co-conspirator 1 have their own marijuana grows at their residences and that they have told them they have eight other growers who grow and sell marijuana to them, which they in turn sell to out of state customers.

CI 16-103 told Detective Galvan it's obvious that they have several growers because the marijuana they sell varies, from high grade to low grades. He then stated that the grades they sell start as follows: Low grade MJ \$1600 (per pound)-\$1900, and mid-grade is \$2000 and high grade \$2100-\$2200.

CI 16-103 explained that he is aware that Co-conspirator 2 and Co-conspirator 1 have one grower in the mountain area of Colorado, and another house which he has been to in Greenwood Village.

The house in Greenwood Village was described as a mansion in a gated community near Arapahoe and Dayton. CI 16-103 accompanied Co-conspirator 2 and Co-conspirator 1 in early January of 2016, but decided he didn't want to go in because he thought it was "sketchy." CI 16-103 said he knew that Co-conspirator 2 and Co-conspirator 1 were picking up marijuana from a guy named "Scott or Scotty" at this residence. While CI 16-103 took a trip to this residence, he knew Co-conspirator 2 and Co-conspirator 1 picked up marijuana and believed it was 10lbs of marijuana.

Detective Galvan was able to pull up a map and show CI 16-103 an area that we believed he was talking about. CI 16-103 was confident when showing Detective Galvan the area he believed "Scott" lived. He directed our attention to a residence on the map and identified the street as E Maplewood Cir in Greenwood Village. CI 16-103 was able to point out a house on Maplewood DR with an address of 9638. Detective Galvan further researched this residence and was able to identify this residence as belonging to a male named Scott Doida

DOB: 05/04/1981. A search in TLO<sup>4</sup> shows he owns a business registered at his address at 9638 E. Maplewood Cir, Green Team trim, a marijuana trimming business.

Detective Galvan has been able to positively identify Co-conspirator 1 and Co-conspirator 2 and both have criminal records:

Co-conspirator 3 also known as “Shadow” was additionally identified and is registered to 3450 E County Line Rd #24. The residence/ apartment were identified by taking CI 16-103 directly to that apartment with Detective Galvan. The apartment was confirmed to be 3450 E County Line Rd #24.

After meeting with CI 16-103 it was determined that CI 16-103 had provided a lot of information that was corroborated. CI 16-103 agreed to continue to assist and an investigation was started.

### **Controlled buy #1**

On 04-08-16, a controlled buy was setup with Co-conspirator 1 using the CI 16-103. This controlled buy was monitored and recorded and Detective Galvan was able to hear the entire conversation. The following is a synopsis of that deal:

The controlled purchase took place at Co-conspirator 1’s residence in Highlands Ranch, CO. Detectives observed CI 16-103 enter the residence. CI 16-103 paid his debt off to Co-conspirator 1 and received another Quarter Pound of marijuana from Co-conspirator 1. During this deal Co-conspirator 1 discussed in depth how he operates his marijuana business. Co-conspirator 1 also provided CI 16-103 with information on how he can make more money selling marijuana. Co-conspirator 1 told CI 16-103 that he trusted the CI 16-103, and believed he can start handling larger sales of marijuana, that are around a pound or less. Specifically he told CI 16-103 he could conduct the transaction with a potential buyer from Chicago for 1 lb. The contents of this conversation made it clear that Co-conspirator 1 was clearly engaged in illegal sales of marijuana and was providing advice to CI 16-103 on how he too could make more money from the illegal sales of marijuana.

During this controlled buy, another male was heard talking on the recorded and live monitored audio. The male identified as “Ant” was already at Co-conspirator 1 residence prior to CI 16-103 arrival. During the controlled buy “Ant” and Co-conspirator 1 spoke about marijuana and the quality of marijuana being provided. Ant was identified as a grower for Co-conspirator 1 and Co-conspirator 2, based off the recorded audio conversation. CI 16-103 confirmed that Ant dropped off 11lbs of marijuana to Co-conspirator 1, who in turn would

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<sup>4</sup> TLO is a Law enforcement online resource that utilizes persons information based off items commonly associated with persons employment ,credit, utilities recorded, and family associations.

sell the marijuana. CI 16-103 observed the large amount of marijuana that Ant provided to Co-conspirator 1.

During this controlled purchase, a vehicle identified as belonging to Co-conspirator 1 was parked at the residence. Also, a silver vehicle bearing Colorado license plate 097VON, was seen parked in front of Co-conspirator 1 residence. The male who was identified as “Ant” was seen entering that vehicle and proceeded to leave the residence. That vehicle registered back to an Anthony Hagman on 7471 S. Eudora Way, Centennial, CO. CI-16-103 confirmed the male named Ant was known as Anthony.

The controlled buy was monitored, recorded, and transcribed. The following was learned during this controlled buy:

Co-conspirator 1 is heard introducing “Ant” to CI 16-103, stating “*You know Ant, don’t you?*”. Ant then introduces himself as “Anthony” and explained how he knew CI 16-103. Co-conspirator 1 and Anthony then converse about how Co-conspirator 1 needs to sell marijuana in order to make his business grow. Co-conspirator 1 begun to explain how much percentage he needs to make off of the quality of marijuana sold. Example, he stated he needed to make 20% on “16’s”<sup>5</sup>. Co-conspirator 1 began to explain how the \$1800 and \$1600 are not interchangeable because he has a buyer that shows up every two weeks and gets “50”<sup>6</sup>, and those have to be \$1800 quality marijuana. Co-conspirator 1 then explains to Anthony that all his “other customers” take the \$1800 marijuana when he doesn’t have the \$1600 quality marijuana.

Co-conspirator 1 begins talking about what is believed to be his personal grow at his residence and one of the strands of marijuana he is growing in one room was “sour tinge”. Co-conspirator 1 explained how one room was ready to be taken down, meaning the marijuana was ready for trimming and processing from the plant into bud.

Co-conspirator 1 and Anthony began talking back and forth about business they have conducted with each other and business they are currently conducting with each other in regards to marijuana. One such extract from the audio that Co-conspirator 1 made to Anthony while discussing how much marijuana they “moved”<sup>7</sup> was “*Well no, it would be eleven. Moved eleven ‘cuz I think we moved ... you gave us six the first time and then three the second time, I think we moved nine.*”

Co-conspirator 1 then begins to explain to Anthony how the stuff he moves every day is the stuff he has to save his cash for. An extract from this part of the conversation which is a statement made by Co-conspirator 1 to Anthony was “*Because the shit that I’m moving every day ... is the stuff I’ve got to save my cash for. But I can, I mean ... if we wants to send ... you know, fifty of them I can buy thirty that I know I can move in the*

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<sup>5</sup> 16’s is referring to marijuana sold at the price of \$1600 per pound. 17s would refer to \$1700 per pound quality marijuana and so on until \$2000.

<sup>6</sup> Believed to be referring to 50 pounds

<sup>7</sup> Moved is a street term meaning to sell

*next week.” Co-conspirator 1 is referring to Anthony having a supplier of marijuana and making a statement that he could take 30 pounds from that supplier and sell them in the next week. Ant replies to Co-conspirator 1 by stating “Which I mean ...he still hasn’t collected the money from those ten from me. That’s the, that’s the funny, that’s why I was starting to get worried because I kept calling him ... and I haven’t seen any of it. Fifteen thousand, (inaudible) fifteen five is what I owe him.”*

The conversation between Co-conspirator 1 and Anthony continued about conducting illegal marijuana sales and Co-conspirator 1 made the following statement *“Like this is I have enough cash, you know, to buy the rest of these and then still probably pick up the ones from that dude, but I just like have promised myself like only so much is getting invested, like credit. The rest if for saving or business or that way, you know, if I get copped on my way to like my next run, I’d not dead in the water. I still have working capital, you know?”* Co-conspirator 1 is explaining to Anthony that he can purchase whatever marijuana Anthony is supplying on this day, which was later confirmed by CI 16-103 to be 11 pounds, and that he (Co-conspirator 1) can still pick up more marijuana from another supplier. Co-conspirator 1 then explains how he doesn’t like to make purchases of that much marijuana because he likes to save cash for his business, and he wants to make sure that if he were to get “copped”<sup>8</sup> that he would have cash available in order to purchase more marijuana to keep the business running.

Co-conspirator 1 made a reference to the apartment, and that if burnt down that the cash he saves would help him still keep the business running. Co-conspirator 1 then told CI 16-103 that he keeps rolling over his cash into buying more grow stuff, referring to marijuana cultivation equipment.

The conversation continued about marijuana and the business, and they began to make small talk about family issues.

At one point in the conversation Anthony is talking about a male named “Scott” who had an assistant that assisted him in getting home. Anthony then refers to Scott’s assistant by saying *“He’s got like a shadow.”* Anthony is referring to Shadow whom Detective Galvan has identified. Anthony stated that Scott’s assistant takes care of everything and Scott pays him good money. CI 16-103 and Co-conspirator 1 begin to talk about Shadow, Co-conspirator 1 made the statement *“We’ve got a shadow.”* CI 16-103 and Co-conspirator 1 start talking about how Shadow is just his nickname. CI 16-103 expressed how scary Shadow was and Co-conspirator 1 agreed saying *“He’s a scary dude..... So you don’t want to be on the wrong end of Shadow”* and CI 16-103 responds and tells Co-conspirator 1 *“No. No, he’s a, he’s definitely intimidating.”* Co-conspirator 1 responds by telling CI 16-103 *“Yeah. Well Ant I appreciate it”*, referring to he and Anthony’s appreciation for Shadows services. Co-conspirator 1 further discusses how Shadow is beneficial, especially because he has customers who want to do deals at midnight.

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<sup>8</sup> Street term meaning to get something taken away, in this instance meaning getting money and or marijuana taken

Soon after, Anthony is heard and observed leaving Co-conspirator 1's residence. CI 16-103 and Co-conspirator 1 then discuss the quarter pound of marijuana he is picking up from Co-conspirator 1. Co-conspirator 1 then starts a conversation with CI 16-103 about how he can earn money by selling a pound of marijuana that he purchases from Co-conspirator 1. Co-conspirator 1 told CI 16-103 that if he purchased a pound of marijuana from him at the price of \$2200 then CI 16-103 should turn around and sell it for \$2300, allowing him to make \$100 profit. Co-conspirator 1 then tells CI 16-103 the other way he can make money is buy selling the pound for Co-conspirator 1 and Co-conspirator 1 would pay him \$100 when he sells that pound of marijuana.

Detective Galvan has provided some extracts from a conversation transcript that took place on 04-08-2016. Detective Galvan has included extracts that are inculpatory. Detective Galvan has not failed to add extracts that are exculpatory.

## **2<sup>nd</sup> Controlled Buy**

04-15-16, another controlled purchase was arranged using the CI 16-103. The controlled buy was arranged to pay back the \$550 to Co-conspirator 1 and Co-conspirator 2 for the last QP that they gave him on 04-08-2016. This controlled buy was monitored and recorded and Detective Galvan was able to hear the entire conversation. The following is a synopsis of that deal:

This controlled buy took place at the stash apartment, 3450 E. County Line Rd #24. Co-conspirator 1 arranged for the CI to meet him at the apartment. CI 16-103 had previously been telling Co-conspirator 1 that he was looking at getting a real job and had some potential offers. Detective Galvan had CI 16-103 tell Co-conspirator 1 that information so the CI would not have to keep getting fronted a QP of marijuana at the cost of \$550 of controlled buy money on a weekly basis. CI 16-103 paid Co-conspirator 1 and during this deal Co-conspirator 1 again discussed his illegal marijuana operation openly. Co-conspirator 1 told CI 16-103 he wanted him to make more money and offered him \$100 for every pound of marijuana he sold. Co-conspirator 1 also told the CI he was a small fish in their business and said that they were selling almost 80 lbs a week. After CI 16-103 left he informed Detective Galvan that he saw two large Hockey size duffle bags with marijuana and a large amount of cash stacks on the counter.

The controlled buy was monitored, recorded and transcribed. The following was learned during this controlled buy:

Upon CI 16-103 arrival he and Co-conspirator 1 made small talk. They soon began to talk about the marijuana business. Co-conspirator 1 explained how he had just returned home from Las Vegas and expressed to CI 16-103 how much he loved being in the marijuana business. Co-conspirator 1 told CI 16-103 how it was time for Co-conspirator 2 to start putting more of his money into the business. Co-conspirator 1 then tells CI 16-103 about marijuana sales that recently occurred stating *"Sold twenty seven pounds while I was gone. We bought fourteen pounds while I was gone. We shipped out four pounds while I was gone.*

*And I'm supposed to figure out how much of his money he put in."* Co-conspirator 1 then questioned himself on how he was supposed to figure out how much of the money Co-conspirator put in. Co-conspirator 1 continues and tells CI 16-103 that Co-conspirator 2 down everything he bought, everything he sold, but complained how all Co-conspirator 2 had to do was write down how much money he put in. Co-conspirator 1 followed up by stating *"That's the only important because everything else we split fifty fifty."*

Co-conspirator 1 went on and started telling CI 16-103 how the accounting in their business is a little messed up. Co-conspirator 1 explained how Co-conspirator 2 spends his earnings and lives his life lavishly, while Co-conspirator 1 saves his money. Co-conspirator 1 told CI 16-103 that Co-conspirator 2 made a statement about only having \$8000 saved up, while Co-conspirator 1 had \$50,000.00 saved up.

At one point during this conversation Co-conspirator 1 begins to tell CI 16-103 that he and Co-conspirator 2 need to essentially get all of their business information put on a laptop in order to keep count of the marijuana they get and everything else that comes in, referring to cash. Co-conspirator 1 also tells CI 16-103 that he has been thinking of hiring a personal assistant to help with the business, specifically to assist in talking with "clients" and "growers".

At this point CI 16-103 starts to explain to Co-conspirator 1 that he doesn't want to take a quarter pound from Co-conspirator 1 because he is looking at doing larger sales of marijuana for the organization. Co-conspirator 1 tells CI 16-103 that if he (CI 16-103) can handle larger sales then he wouldn't hire anyone else, and follows up by telling CI 16-103 that so far he hasn't been able to handle it. Co-conspirator 1 then tells CI 16-103 that he is sometimes too busy to call some of the people CI 16-103 refers to him for large sales of marijuana because he has too much going on. Co-conspirator 1 stated *"business structure is set up one pound and under ... is you. And ... we'll make sure you make your money on that."* CI 16-103 responded by saying *"yeah"* and Co-conspirator 1 tells CI 16-103 *"One time or it's you, and you show up, you know, and they're like we want like four or five pounds ... you bring them to us, we'll hook you up. We'll make sure you make your money. We always make, well even ..."*

Co-conspirator 1 continued and told CI 16-103 about how he can sell pounds of marijuana for the organization saying *"But if you talk to them and you feel them out, you, you, you decide, you know, what are they willing to pay, you know our prices are like ... they're like sixteen to twenty three but really ... they're nineteen and twenty two."* Co-conspirator 1 followed up and told CI 16-103 that sometimes they have cheap marijuana and sometimes they have some super expensive marijuana, but said *"we always have nineteen or twenty"*

Co-conspirator 1 went on to explain to CI 16-103 on how he should vet future potential customers, to include making sure that the customers aren't "black". Co-conspirator 1 told CI 16-103 that if he did most the hard work prior to the deal, then he could make \$100 off a pound. Co-conspirator 1 explained by saying *"I didn't have to talk to them, I didn't have to meet them, I didn't have to ... fucking make sure he was okay, make sure he wasn't a robber, make sure he wasn't a cop."*

The conversation started to again discuss more about the quarter pound of marijuana CI 16-103 usually takes. When CI 16-103 rejected taking the quarter pound of marijuana to sell, Co-conspirator 1 expressed how that was such a small part of their business. Co-conspirator 1 told CI 16-103 *“Negligible, like I literally we sell eighty pounds a week.”*

Co-conspirator 1 and CI 16-103 continue to discuss the business of marijuana and eventually Co-conspirator 1 shows CI 16-103 some high grade marijuana. Co-conspirator 1 told CI 16-103 the marijuana was amazing, but stated he thinks Co-conspirator 2 paid too much for it. CI 16-103 tells Co-conspirator 1 he is the one who usually buys more expensive marijuana. Co-conspirator 1 then tells CI 16-103 *“This, this is what I came back to, this is what I came back to. Here’s what we got from Scott. Here’s what we sold. Here’s what we sold.”* CI 16-103 replies *“oh Jesus”* and Co-conspirator 1 replies *“Minus what we sold to Gus and I think some of this was my money. So ...”*<sup>9</sup>

Co-conspirator 1 and CI 16-103 discuss the issues Co-conspirator 1 was having tracking all the money earned and marijuana sold because of Co-conspirator 2. Co-conspirator 1 tells CI 16-103 *“So like we sold twenty seven pounds while I was gone ...”* following up that statement with *“We generally make ... two hundred per pound so ...”* CI 16-103 answers *“Yeah”* and Co-conspirator 1 then tells him *“We probably made about five grand. Fifty four hundred if you want to be picky but we give Shadow ten percent. Ten percent of fifty four is ...”*

The conversation ended with talks about Co-conspirator 2 and his marijuana grow, and included conversation about a grow Co-conspirator 1 has.

Detective Galvan has provided some extracts from a conversation transcript that took place on 04-15-2016. Detective Galvan has included extracts that are inculpatory. Detective Galvan has not failed to add extracts that are exculpatory. The reader should refer to exhibit 8 for the entire transcribed conversation.

### **Traffic stop out of state buyer**

On 08-04-2016, at approximately 1300 hours Detective Lord and Detective Galvan were conducting surveillance of 3450 E county Line Rd #24. At approximately 1405 hours, Detective Lord had a visual on the apartment and advised Detective Galvan that he observed two vehicles parking directly across from the target apartment. One vehicle was described as, a silver BMW, which had a dealer tag “Schomp BMW”. The other vehicle that followed in was a VW bearing Texas Plate : GWC7197. Detective Lord advised that the male that exited the BMW was a white male that he identified as Co-conspirator 2. Detective Lord is familiar with the case and has seen numerous photos of Co-conspirator 2. The VW with Texas Plate had an unknown black female exit. The female exited her car with a large black duffle bag that appeared to be nearly empty. Detective Lord said he could tell there was something in the bag, but it did not fill up the bag. The male, identified as Co-conspirator 2, was carrying a

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<sup>9</sup> Detective Galvan knows that based on the investigation to date and evidence, that when Co-conspirator 1 is speaking of Scott, he’s referring to Scott Doida, and when he speaks of Gus he is referring to the person identified as Gus Ruiz-Medrano.

dark colored backpack and some reusable grocery type bags. The male and female walked up in building 3450 and into apartment #24.

At approximately 1420 hours, Detective Lord observed the black female from the VW exiting from the apartment. Detective Lord advised that the female had the same black duffle bag, but now the bag appeared to be filled. The black duffle bag was placed in the trunk of the VW and the female drove east onto County Line Rd. A surveillance team followed the VW. Detective Galvan observed the VW stop at the Valero gas station on County Line Rd and Quebec and get gas. Detective Galvan made the decision to follow the vehicle and observed continue driving, going south on Colorado Interstate 25. At this time Detective Galvan had a traffic stop conducted for the noted traffic violations. Douglas County K-9 Deputy Glassburner conducted the stop. During surveillance Detective Galvan, Detective Lord and other Detectives observed the vehicle fail to use its turn signal on two occasions, once at I-25 and Lincoln and the second at I-25 and Plum Creek Pkwy. Deputy Glassburner conducted a traffic stop at I-25 and Tomah Rd and advised the driver that the reason for the stop was for the traffic infraction. Deputy Glassburner advised the following:

- The driver, identified via Texas D.L. as Brianna Williams DOB:09/06/1993
- She appeared to be very nervous.
- Deputy Glassburner asked her if she had any drugs in the vehicle and to his surprise, she immediately admitted that she had marijuana inside the vehicle.
- Deputy Glassburner ran his K-9 around the vehicle and received a positive alert.
- A search of the vehicle he found a large black duffle bag inside the trunk, the same bag Detective Lord observed.
- Inside the bag were numerous large bags containing marijuana., such as “GG”<sup>10</sup>
- The marijuana bags were marked with the type of strain that was in each bag.
- There was approximately 11 pounds in total.

Detective Galvan arrived and began conducting an interview with Brianna after she was advised of her Miranda rights and agreed to speak with Detective Galvan. In order to maintain the integrity of the long term investigation, Detective Galvan did not apprise Brianna that he was aware where she had been and that she was observed making a purchase. This interview was recorded and in part the following was learned:

Brianna admitted to that she was transporting the marijuana back to Amarillo, Texas, where it was to be sold. Brianna said a male by the name of Gus, white/Hispanic male , provides her

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<sup>10</sup> GG is also known sometimes as Gorilla Glue, a strain of marijuana. Marijuana bud has various names.

the money and pays her \$100 per pound to pick up and transport the marijuana back to Amarillo, Texas. Brianna left Amarillo in the morning (08-04-2016) around 830 hours, and picked up the marijuana.

Gus provided her the money in a bag. She spoke with the male whom she knew as “Co-conspirator 2”, via telephone communication. She notified Co-conspirator 2 when she arrived in Colorado and when she was close to the area she has picked up marijuana before. Co-conspirator 2 then told her what address to go to in order to pick up the marijuana. The marijuana was then picked up from a male she knew as “Co-conspirator 2”, whom she described as a white male approximately in his mid-30’s, with a shaved head.

Brianna stated that she has made the trip from Amarillo, Texas to Colorado seven times, and that she has purchased multiple pounds of marijuana each time from Co-conspirator 2. Brianna said that she initially traveled with Gus when picking up the marijuana. Gus introduced her to Co-conspirator 2 and soon she was able to start traveling to Colorado on her own to make the purchases for Gus.

Brianna said that Gus gave her the black duffle bag that the marijuana was found in, and that it had money inside of the bag that paid for the marijuana that was found inside her trunk by Deputy Glassburner.

When Brianna was near the apartments she called Co-conspirator 2, and he met her at the apartment, which she gave an address of 2450 E county Line Rd (which is the main address for the Copper Canyon apartments where the stash apartment is located).

Brianna described the vehicle Co-conspirator 2 was driving, as a newer silver BMW. She then said upon meeting Co-conspirator 2 she parked her car and followed Co-conspirator 2 inside the apartment, which is when Detective Lord had observed her being accompanied by Co-conspirator 2.

Brianna then gave Co-conspirator 2 the money and he counted the money while inside the apartment. Brianna believed the amount of cash she provided Co-conspirator 2 was \$24k. If the amount of cash was \$24k, that would put each pound of the 11 pounds found at a price of almost \$2200 per pound. This is consistent with high grade marijuana being sold from this organization at that price.

Brianna said Co-conspirator 2 then placed the marijuana inside the black duffle bag and she left. She stated that she has done deals with Co-conspirator 2 before, and she has seen a gun visibly showing. Brianna further clarified and said that all the deals she has been involved in have been conducted at the apartment, 3450 E. County Line Rd #24.

The marijuana was seized and later booked in. There were 11 bags that each had a weight of approximately 1 pound. Brianna was not advised that we were aware of any of the

information and was released so our investigation could continue without compromising the case.

Detective Galvan was eventually able to identify the true identity of Gus. Detective Galvan contacted Agents in Amarillo, Texas in order to achieve this. In January of 2017 Detective Galvan spoke with Agent Carlos Perez of Amarillo, Texas Police Department. Detective Galvan advised Agent Perez of his investigation and apprised him of the traffic stop that revealed the marijuana was destined to Amarillo, Texas and the financier of the marijuana "Gus" was a suspect. Agent Perez, after being informed of the information Detective Galvan obtained, immediately said he believed he knew exactly who Gus was. Agent Perez identified him as "Gus" Gustavo RUIZ-MEDRANO DOB:11-01-1991. Agent Perez said that they have an ongoing investigation of Gus, who was stopped on January 2<sup>nd</sup> 2017, by Amarillo Police. During the traffic stop they recovered approximately 72.82 grams of marijuana, 64.64 grams of marijuana wax, and \$25,000.00 in cash. Gus agreed to cooperate and provided information about his source of supply of marijuana. Gus admitted that he sold marijuana because it was a quick way to make money. Gus admitted that the money found was proceeds from marijuana sales. Gus told Agent Perez that he gets his marijuana from a male in Texas who gets his marijuana from Colorado. Agent Perez told Detective Galvan that he was aware that Sgt Shane Mays of the Randall County Sheriff's Office in Texas, had an ongoing investigation that included Gus as their main suspect in a large scale marijuana operation. Sgt Mays authored a report detailing his investigation. The report contains information about Gus's involvement in marijuana sales. The report also contains recorded jail phone calls that Gus made to his girlfriend Reyna Portillo DOB: 05-09-1996. During the conversation Reyna tells Gus that she told "Bree", whom Detective Galvan and Sgt Mays have confirmed as Brianna Williams, to come back. Reyna said that Bree had just got to town but was told to come back. We believed that Brianna Williams was in Colorado picking up more marijuana to transport back to Amarillo, Texas. Sgt Mays also relayed to Detective Galvan that they have phone data they received from a phone Gus owned. Sgt Mays advised that during the search of the data, specifically text messages he sent, showed that since January 2017 to mid or late part of January 2017, Gus was in Colorado picking up marijuana on five occasions. Detective Galvan has attached a copy of a synopsis report provided by Sgt Mays.

Detective Galvan provided Sgt Mays the phone number that Brianna Williams had in her cell phone listed as "Gus". Detective Galvan captured a photograph of the number from Brianna's phone on 08-04-2016. Brianna had also confirmed that the phone number listed as "Gus" was the same Gus who sent her to Colorado with cash to purchase over 11 pounds of marijuana from Co-conspirator On 08-04-2016. Sgt Mays confirmed that the phone number was the same number they had for Gus Ruiz-Medrano. In addition, Brianna had a text message between her and Gus, where Gus told Brianna to get a hold of Reyna to pick up cash. This further confirms and corroborates Gus's identification and involvement with this organization.

## **Postal Inspector Information**

On February 8<sup>th</sup> 2017, Detective Galvan received information from Postal Inspector Brook Fuller. Inspector Fuller advised that he had information that was related to Detective Galvan's case. Inspector Fuller authored a report. The report contains a large amount of inculpatory information, and confirms that this organization is involved in shipping marijuana through United States Post Offices, and in return receiving cash. Detective Galvan has added the authored report in this affidavit. The report authored by Inspector Fuller reads in part :

*In January of 2017 Denver US Postal Inspectors, while conducting routine USPS records checks, noticed a suspicious pattern of mailings into PO Box 4587, Greenwood Village, CO 80155.*

*On February 3, 2017 I collected Express Mail EL 678311395 US, which had been held for further investigation, addressed to James Jones, PO Box 4587, Greenwood Village, CO 80155 bearing return address Dennis Jones, 4057 Olive St Apt B, St Louis MO, from the Greenwood Village Post Office for further investigation.*

*When I collected the parcel, I could see that it had been damaged in processing, partially exposing the contents. I observed a stack of US Currency secreted in a magazine. Based on my training and experience, this seemed to be narcotics proceeds.*

*On February 7, 2017 Inspectors and Arapahoe County Sheriffs Deputies set up to do a controlled delivery of the suspected drug proceeds parcel at the Greenwood Village Post Office, 6855 S Dayton St, Greenwood Village, CO. According to USPS supervisors, Jones had been calling the post office about the parcel.*

*At about 1:55 PM I left a voice mail at phone number 843-642-3690, the listed number on the PO Box application for Jones. I stated that I had the lost parcel, and that Jones could call the post office and ask for Ernie. I placed a USPS slip in the PO Box to use to collect the parcel.*

*A few moments later a male, verbally identified as James Jones, called and asked about the parcel. He stated he would come in and get the parcel, but it may be later that afternoon or evening.*

*At about 2:45 PM A male person, claiming to be James Jones, arrived at the counter of the Post Office with the USPS slip. I walked out to the counter, in an undercover capacity as a USPS employee, and asked if the parcel was his. He said yes. I apologized for it being late. The male stated it was not a problem, and left the post office. Jones appeared to be thinner and had longer hair than his South Caroline license photo.*

*The Male exited the post office and entered a white 4 door Lexus with a New England Patriots sticker on the back window driven by a Hispanic male in a baseball style cap. The vehicle exited the post office onto Dayton and traveled north. At about 2:50 PM the vehicle parked on the street between 9646 and 9638 E Maplewood Cir, Greenwood Village CO for about 10 minutes.*

*At about 3:00 PM the vehicle left the Maplewood address and drove east on Maplewood, south on Dayton, then west on Arapahoe Road and onto Southbound I-25. The vehicle then went west on C470, south on University Blvd, then west on Dad Clark Dr, south on S Homestead St, then parked in front of the address of 802 Windmill Place, Highlands Ranch (Littleton) CO, 80126.*

*The vehicle stayed parked in front (north side) of the house until surveillance was stopped, at about 5:40 PM.*

*On February 8, 2017 I learned through a check of USPS records that the addresses of 802 Windmill Place, Highlands Ranch CO 80126, 476 Pluto Court, Lone Tree, CO 80124, PO Box 4587, Greenwood Village, CO 80155, and 3450 E County Line Road, #24, Highlands Ranch CO 80126 were associated.*

*Between August of 2016 and February of 2017 these four addresses had received more than 75 USPS Express Mail parcels. (Overnight service) These parcels came from the following states; Iowa, New York, Texas, Missouri, South Carolina, Illinois, Indiana, and Florida.*

*On February 9, 2017 A search of USPS records showed that the address of 3450 E County Line Road, #24, Highlands Ranch CO 80126 had received two Express Mail parcels that week addressed to Co-conspirator 3. It was learned that both Parcels were at the Highlands Ranch Post Office, 9609 S University Blvd, Highlands Ranch CO 80124.*

*Inspectors instructed the supervisors to hold these two parcels for further investigation. Further investigation showed this address, PO Box 4587, Greenwood Village, CO 80155, had received 26 USPS Express Mail parcels, (overnight service) between August 1, 2016 and February 8, 2017.*

*I responded to the Highlands Ranch Post Office to collect the two parcels. Before leaving the Highlands Ranch Post Office I provided a phone number to the USPS supervisors to provide any person that came to the post office looking for the parcels, including Jay Frey. This phone number is used by US Postal Inspectors for law enforcement purposes. The number is purported to be for customers to call to help locate lost parcels.*

*Parcel number one is described as:*

*Express Mail parcel bearing tracking number EL 665352285 US, addressed to Co-conspirator 3, 3450 E County Line Rd, #24, Highlands Ranch CO 80126, bearing return address of Dennis Jones, 4048 Olive St, Apt B, St Louis, MO 63108.*

*Parcel number two is described as:*

*Express Mail parcel bearing tracking number EL 614934485 US, addressed to Co-conspirator 3, 3450 E County Line Rd, #24, Highlands Ranch CO 80126, bearing return address of H. Haile, 2701 Airline DR, Ste K, #179, Metairie, LA 70001.*

*On February 9, 2017 at about 2:39 PM a male person called the number provided by US Postal Inspectors to the supervisors at the Highlands Ranch Post office. He identified himself as Co-conspirator 3. He provided the tracking numbers from the two parcels in the custody of the Postal Inspectors.*

*Inspector Backus, operating in an undercover capacity as a USPS employee at the lost parcel office, spoke to Co-conspirator 3. Co-conspirator 3 stated both parcels were addressed to him but he was not sure of where they were mailed. He stated he thought one was from Louisiana and one from St Louis, MO. Co-conspirator 3 stated that the contents of the parcels were paperwork, titles, documents and a checkbook. Co-conspirator 3 stated he would call back with the return addresses.*

*At about 3:23 PM Co-conspirator 3 called and spoke to Inspector Backus again. He provided the return addresses on the parcels. Co-conspirator 3 was told that USPS employees would attempt to find the parcels and call him back.*

*On February 9, 2017 I submitted a search warrant application through the Colorado US Attorney's office for a search warrant for both parcels.*

*On February 10, 2017 I contacted the Douglas County Sheriff's Office regarding the address in Highland Ranch, Douglas County. I learned that this address, as well as others, was involved in current investigation with the Sheriff's Office's Impact Team.*

*On February 10, 2017 US Magistrate Judge Nina Wang issued two federal search warrant for the above parcels based on the affidavits I submitted.*

*On February 13, 2017 Both parcels were opened via search warrant at the US Postal Inspection Headquarters, 1745 Stout Street, #200, Denver Colorado.*

*Express Mail parcel bearing tracking number EL 614934485 US, addressed to Co-conspirator 3, 3450 E County Line Rd, #24, Highlands Ranch CO 80126, bearing return address of H. Haile, 2701 Airline DR, Ste K, #179, Metairie, LA 70001 contained the following:*

- *\$ 3,850.00 in US Currency, 4 10's, 138 20's, 5 50's, and 8 100's.*
- *Plastic heat sealing bag*
- *Small USPS cardboard box*
- *5 Walmart plastic "shopping type" bags*
- *1 USPS Mylar large envelope*

*The above items were NOT seized.*

*Express Mail parcel bearing tracking number EL 665352285 US, addressed to Co-conspirator 3, 3450 E County Line Rd, #24, Highlands Ranch CO 80126, bearing return address of Dennis Jones, 4048 Olive St, Apt B, St Louis, MO 63108 contained the following:*

- *\$ 7,300.00 in US Currency, 15 20's and 70 100's.*
- *Woman's Day Magazine*
- *Clear plastic wrap*
- *White USPS cardboard envelope.*

*The above items were seized and are in the Denver US Postal Inspection Service Evidence room.*

*On February 13, 2017 a male person who identified himself as Co-conspirator 1 called the Postal Inspection Service lost parcel line. Inspector Backus spoke to Co-conspirator. Co-conspirator stated he was calling on behalf of Jay Frey. Co-conspirator stated that the parcels contained documents and things about the size of a magazine.*

*At about 9:30 Inspector Backus called the number provided the week before by Co-conspirator 3. Co-conspirator 3 was told that one of the parcels was found, number EL 614934485 US, addressed to Co-conspirator 3, 3450 E County Line Rd, #24, Highlands Ranch CO 80126, bearing return address of H. Haile, 2701 Airline DR, Ste K, #179, Metairie, LA 70001.*

*Co-conspirator 3 was asked if he could meet at the USPS Downtown Post Office 951 20<sup>th</sup> Street, Denver CO 80202 to collect the parcel, as we needed a signature. Co-conspirator 3 agreed to meet at about 1:00 PM that day.*

*At about 11:00 AM, Co-conspirator 3 called again. He stated that he wife was in labor and that he had to leave town. He requested that his friend pick up the parcel. He stated his friend was named Co-conspirator 1. I told Co-conspirator 3 that that was fine, but that Co-conspirator would need to show and ID. Co-conspirator 3 stated he would have Co-conspirator 1 there at 1:00 PM or so.*

*At about 1:15 PM Co-conspirator 1 arrived at the post office. He walked into the lobby. Inspector Backus, acting in an undercover capacity as a USPS employee called out if there Co-conspirator was there to collect a parcel. Co-conspirator 1 walked to the counter and spoke to Inspector Backus. Co-conspirator 1 provided Colorado DL, bearing the name Co-conspirator 1, to Inspector Backus.*

*Co-conspirator 1 signed for the parcel, thanked Inspector Backus and left the post office.*

*Co-conspirator left the post office parking lot in his vehicle.*

Detective Galvan surmised that based on all of the evidence and information obtained from this investigation that the initial package picked up by James Jones showed he likely stopped at 9638 E. Maplewood Cir, the residence of Scott Doida, an involved co-conspirator in this

organization. Detective Galvan believes that Jones, traveling in the white Lexus with another unknown Hispanic male, then drove to Co-conspirator's 1 residence. Detective Galvan refers the reader back to earlier where the same white Lexus with New England Patriots sticker and a Hispanic male driver, were observed on 02-02-2017 as being involved in what was believed to be an illegal marijuana transaction with Co-conspirator 1 and Co-conspirator 2.

### **Tracker Reports**

Both Co-conspirator 1 and Co-conspirator's 2 vehicles had trackers placed on their vehicles after search warrants were approved through Douglas County court. The tracker reports show that between October 26, 2016 and December 23, 2016 there were multiple instances where Co-conspirator and Co-conspirator were in the same location Co-conspirator's 1 residence, Co-conspirator's 2 former residence, Centennial Trail, Highlands Ranch, CO 80129 (Stash House for money and marijuana) and a house rented by Co-conspirator 2 for marijuana related activities.

The tracker reports records show Co-conspirator 1 and another Co-conspirator 2 both have been to 9638 E Maplewood Cir., Englewood, CO 80111 multiple times between October 2016 and December 2016. The investigation has shown this is the residence of Scott Doida. Xcel energy records show that between April 2015 and August 2016 the energy usage average 5,863 kWh per month with a low of 3,132 kWh in October 2015 and a high of 8,538 in August 2016. The investigation has shown that Doida runs a marijuana trimming business and uses Co-conspirator 1 and Co-conspirator 2 to sell and distribute excess marijuana from his work and from his home marijuana grow at 9638 E Maplewood Cir., Englewood, CO 80111.

The tracker report for Co-conspirator 1 vehicle show that he has been to 7471 S Eudora Way, Centennial, CO 80122 multiple times between October 2016 and December 2016. Xcel energy records show that Jacqueline Landry is registered on the electrical at 7471 S Eudora Way, Centennial, CO 80122 and between April 2015 and August 2016 the average kWh per month was 6,206 kWh. Public records show that 7471 S Eudora Way is a residential house that is approximately 1,296 square feet. Based on my training and experience 6,206 kWh per month is very high for a home that has 1,296 square feet.

Tracker reports show that Co-conspirator 1 has continued to go to both TCF Bank branches and Wells Fargo bank branches in January and February 2017.

Detective Galvan, through grand jury subpoena, received new information from Xcel energy regarding Co-conspirator 1 residence. The kWh showed that they drastically decreased for the month of January 2017. Based on prior kWh used, and through Detective Galvan's training and numerous investigation into marijuana cultivation, the amount of kWh used it was believed that there was a marijuana grow at Co-conspirator 1 residence. In addition, Co-conspirator 1 talked about his marijuana grow that he had. Detective Galvan knows that it is common for kWh to have various cycles that differ based on when marijuana is being

harvested<sup>11</sup>. Detective Galvan knows a lot of time, effort, and expense goes into setting up a marijuana grow operation.

Detective Galvan, through grand jury subpoena, received new information from Xcel energy regarding 9638 E. Maplewood Cir. The records obtained from Excel show that from December 21<sup>st</sup> 2016 until January 25<sup>th</sup> 2017, 7352 kWh were used. Accordingly, based on Detective Galvan's training and experience, he believes this power usage appears to be consistent with the organization's continuing marijuana grow operations.

Detective Galvan, through grand jury subpoena, received new information from Xcel energy regarding 7471 S. Eudora Way. The records obtained from Excel show that from December 27<sup>th</sup> 2016 until January 27<sup>th</sup> 2017, 6199 kWh were used. Accordingly, based on Detective Galvan's training and experience, he believes this power usage appears to be consistent with the organization's continuing marijuana grow operations. Detective Galvan also reminds the reader that Anthony Hagman was present during what was named "controlled buy" in this affidavit, in which Hagman discusses the sale and cultivation of marijuana to Co-conspirator 1. The utility records show Jacqueline Landry as the customer registered on this account. Detective Galvan located Anthony Hagman via Facebook and he list Jacqueline Landry as being in a relationship. Photos of the two together were also observed.

Detective Galvan has conducted wage checks through the Colorado Department of labor on the principal subjects and co-conspirators involved in this investigation. The following information was learned:

Detective Galvan authored 6 search warrants for residences involved in the enterprise, which included the residence of 7471 S. Eudora Way, the residence of Antony Hagman. The warrants were executed on March 2<sup>nd</sup> 2017.

#### 7471 S . Eudora Way

Detective Holmes was assigned to execute and monitor the search of Hagmans residence. He interviewed Hagman. He asked him what all the marijuana was for and he told me that it was for personal use but he does share with those that help him grow and process the marijuana. He believed he has given marijuana to other individuals that may have given it to others but did not give specifics concerning these transactions. He asked him how many plants he had in his basement marijuana grow and Anthony told me they cut down eight yesterday, seven in flower, and 15 that were in a vegetative state, 22 in total recently. Anthony could not tell me how much product he currently has since it was drying in the garage, estimated that he gets five-six pounds from his basement. Anthony would save two pounds to smoke and the rest he would process into tinctures and edibles. He asked who Anthony gives the finished product to and he told me that it is a group of friends that help him grow and process the marijuana.

I asked Anthony how he knew co-conspirator 1<sup>12</sup> and he stated that he knew co-conspirator 1 for a long time and that he lived with him at one point in his house at Acres Green (in the

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<sup>11</sup> Harvested refers to when the marijuana plant has completed its cycle and the actual marijuana is ready to be trimmed from the plant into the marijuana bud.

basement) for six months about eight years ago. Anthony said that he last spoke with co-conspirator 1 yesterday. According to Anthony, he gave co-conspirator 1 a pound of marijuana last time he harvested, which was six months ago. Anthony reiterated that he was trying to spread 'organic' marijuana so that people aren't smoking potentially hazardous marijuana. Anthony has been growing for 5-6 years. Anthony's annual yield was estimated to be 15-20 pounds.

Hagman clarified that he does help others set up and manage grows at their houses. Anthony said that one of the houses he assists with the marijuana grow is 'down the street' from his residence at Eudora. He identified the house to be 7016 S. Dahlia St. Anthony said that Dan and his girlfriend Emily resided at this location. He again reiterated that he wants to assist others in growing 'organic marijuana' so he helps others grow marijuana. Anthony feels that he is doing a 'service' to others. He went on to elaborate on saying that this residence has two 'flower rooms' and he has worked out a deal with Dan and Emily that he receives 20% of the finished product from this marijuana grow. Anthony went on to say that there have been three harvests; yielding approximately 8-10 pounds per harvest at the Dahlia Street marijuana grow. Anthony stated that he does not get paid money for his services toward Dan and Emily. The only payment that he receives is in the form of marijuana product. According to Anthony, Dan and Emily does not have any association with co-conspirator 1. Anthony is mainly working with Emily in regards to growing marijuana.

The additional marijuana grows that Anthony stated that he helps with was co-conspirator 1 house, which he stated was near Dad Clark and Homestead. Anthony stated that he helped set up co-conspirator 1's grow. He also set up a marijuana grow at his mother's (Wanda Hagman) residence, located at 3254 S. Bahama Street in Aurora. Anthony said this grow was strictly for his mother, who was terminally ill. He also helped set up a marijuana grow approximately 18 months ago for a large male he identified as Zeke. It was later determined that the location was 3402 Colorado 121, Wheat ridge, Colorado. Anthony stated that he had not spoken to Zeke since he set up the marijuana grow.

Anthony went on to state he is currently renting the 7471 S. Eudora house for \$1,800 a month. The landlord knows that he operates a marijuana grow out of the residence. The landlords are in their 70s and have never inspected the marijuana. He said that he gave co-conspirator 1 a pound of marijuana about a month and a half to two months ago. So co-conspirator 1 could see 'what organic looked like.' Anthony gives co-conspirator 1 any extra marijuana he has. Anthony stated that co-conspirator 1 did not give him any money for this marijuana and went on to say he gets a percentage of the marijuana product from the marijuana grows he helped co-conspirator 1 set up. Typically, this works out to be one pound per harvest, or 20% of the total harvest. There has not been a harvest at co-conspirator 1's house.

According to Anthony, his primary source of income was from his construction job, which he works with AJH Construction. Anthony stated that he works seasonally and made approximately \$20,000 last summer. Anthony said that many of the construction jobs he

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<sup>12</sup> Det. Holmes revealed the identity of co-conspirator 1 in his report. The identity was replaced with co-conspirator 1, whose identity is known to the grand jury.

contracts are paid in cash as unreported income. Anthony went on to say that, he does not have any debt or many bills.

Anthony eventually admitted to connecting co-conspirator 1 with numerous out-of-state buyers, for the purposes of selling marijuana.

As a result of the search warrant and interview conducted by Detective Holmes an address that Hagman identified as an additional marijuana cultivation site was also searched.

Subsequent to speaking with Hagman, officers arrived at 7016 S. Dahlia St. While at that residence, officers spoke with Dan Levy on the phone, and later in person. Levy stated that Anthony sub-leases his basement for \$1,000.00 per month but is behind on payments. Levy said that he had a lease agreement with Anthony who was to pay \$1,000.00 per month to his parents as he (Dan) had to borrow money from his parents and needed to pay off his debt to them. Anthony was to pay his (Dan's) parents directly. Dan stated that Anthony set up the basement to grow marijuana. He stated that Anthony installed all the electrical modifications to the basement. Levy added that he would get 20% of Anthony's harvest in addition to paying the \$1,000.00 per month. Pursuant to a search of Levy's home, an operational marijuana grow was discovered, and dismantled.

Information learned from the investigation, including statements obtained from members of the organization, revealed that the enterprise sold in excess well over 1500<sup>13</sup> pounds of marijuana and received more earned more than one millions dollars during its existence. A lot of the proceeds were used to reinvest in the enterprise, to include purchasing more marijuana to be sold to buyers who in turn took back to their perspective state to be sold.

#### Alberto Romero and Alexandra Romero

On March 7<sup>th</sup> 2017, Alberto Romero and Alexandra Romero arrived at 3450 E. County Line Rd, located in the State of Colorado, and County of Douglas, in order to purchase 40 pounds of marijuana from the enterprise, which was destined to be sold transported and sold in the state of Texas. Alberto and co-conspirator 1 previously discussed the amount of marijuana to be sold via telephone communication. Alexandra and Alberto provided co-conspirator 2 with a \$67,140.00 in order to purchase 40 pounds of marijuana unlawfully. Alberto also had on him at the time of his arrest a handgun. Alberto also had packaging materials inside his vehicle, so he could ship the marijuana back to Texas, where it was to be sold. Alberto admitted to Detectives that he came to Colorado to purchase marijuana from the enterprise and sell the marijuana back in his home state of Texas. Alberto also admitted he has come to Colorado approximately 6 to 8 times to purchase marijuana from the organization. Co-conspirator 1 and co conspirator 2 estimated they have sold Alberto in excess of 800 to 1200 pounds of marijuana during his involvement in the enterprise. Alberto first became involved in the enterprise on or about early part of 2016.

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<sup>13</sup> The average pound sold in the organization went for about \$1700. The lower end would have been \$1500 per each pound and the highest typically being sold at \$2200 per pound.

Officers documented numerous text-messages and cellular phone calls between Albert Romero and co-conspirator 1, across multiple days, arranging transactions for the illegal sale of marijuana.

On March 7<sup>th</sup> 2017 at approximately 1245 hours, a white GMC Terrain with Texas license plate HRX6126 arrived and parked directly in front of the stash apartment (3450 E. County Line Rd #24). Detectives aird that a Hispanic male and Hispanic female exited and walked inside the apartment. A few moments later Detective Pollack observed the female exit the apartment and walk to the white GMC, where she retrieved what appeared to be a small postal box. The female took the box inside. A few minutes later after we were made aware that they had engaged in the transaction for 50 pounds of marijuana, Detective Galvan assisted with making entry inside the apartment. Upon entry Detective Galvan noted a Hispanic male on his knees going through the marijuana<sup>14</sup> that was placed on the couch. A female was standing at the kitchen counter. The male, identified with Texas ID as Alberto Romero. Detective Lord and Detective Galvan immediately detained Alberto. A pat down for weapons revealed that he had a Glock 27, .40 caliber concealed inside his pant pocket. An extra magazine that was fully loaded with ammunition was also found inside his pocket.

Their vehicle was taken to the Sheriff's Office for possible seizure. Prior to removing the vehicle from the scene Detective Lord conducted an inventory of the vehicle. During his inventory, he noted that inside a plastic tub in the cargo area of the vehicle. Inside the plastic tub were three large duffle bags. Two of the bags were identified as bags know as bags sold by co-conspirator in past deals. The co-conspirator has had bags called "dope bags", the dope bags were charcoal lined and assisted in deterring the smell of marijuana from emitting. The bags are uniquely identified and are sold by the enterprise, specifically co-conspirator 1 and co-conspirator 2, to customers purchasing marijuana from them. Alberto provided deceitful information to Detective Galvan and TFO Nunley, law enforcement officers in acting in official capacity, in attempts to influence their decisions.

Alberto's deceitful story revolved around a claim to law enforcement agents that he only sells small amounts of marijuana. However, in contrast to his assertions to the above named law enforcement officers, Alberto by his own admission in recorded phone calls, and text message communication stated he was selling 40 pounds a week. In addition, when Alberto was first contacted inside the apartment he stated he was just there to smoke marijuana. Evidence, as noted above, contradicts and shows that Alberto was there to purchase marijuana.

#### Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 1-3 .

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<sup>14</sup> The operation was recorded and the marijuana was actual marijuana that was seized previously from the organization. The marijuana was checked from evidence in order to complete the operation.

On March 2<sup>nd</sup> 2017, March 4<sup>th</sup> 2017, March 7<sup>th</sup> 2017, Alberto Romero used his cell phone to facilitate the distribution of marijuana and his conspiracy to distribute marijuana.

Alberto and co-conspirator 1 first spoke on March 2<sup>nd</sup> 2017. The recorded phone call conversation in synopsis went as follows:

Co-conspirator 1 contacted Alberto and immediately greeted each other. Co-conspirator 1 asked him how “business” has been. Alberto responded by saying that business has been good and that his business has picked up. Alberto asked co-conspirator 1 how business has been from him and co-conspirator 1 immediately began telling Alberto that business has been good and began referring to the supply of marijuana he had for his business. Alberto and co-conspirator 1 began talking about marijuana and the prices of high quality marijuana. Alberto asked co-conspirator 1 “ok you said uh how much for tops<sup>15</sup> again”, and co-conspirator 1 responded by telling him the price per each pound was going for about \$1700 to \$1800. Co-conspirator 1 told Alberto the tops he had were “gorilla glue”<sup>16</sup>. Alberto asked co-conspirator 1 if he had an unlimited supply of the gorilla glue. Co-conspirator 1 told Alberto that he could sell him at least 40 pounds of the gorilla glue. Alberto then began talking about his other sources of supply for marijuana. Alberto told co-conspirator 1 that he called at the right time because he was getting ready to come to Colorado to purchase more marijuana. Alberto inquired about other top shelf marijuana co-conspirator 1 had in stock. Alberto stated he could arrange to meet co-conspirator 1 to purchase marijuana on Tuesday March 7<sup>th</sup> 2017, as he would be arriving Monday night, March 6<sup>th</sup> 2017 to Colorado. Alberto also discussed how his business has begun picking up telling co-conspirator 1 that he has been able to sell 40 pounds of marijuana in a single week as of lately. Alberto ended the conversation by thanking co-conspirator 1 for calling so they could continue business as they have in the past stating “back to the regular program.” Alberto told the co-conspirator 1 he would likely purchase 50 pounds.

On March 4<sup>th</sup> 2017, Alberto Romero used his cell phone to facilitate the distribution of marijuana and his conspiracy to distribute marijuana. The text message sent to co-conspirator 1 went as follows:

March 4<sup>th</sup> ,2017, send from Alberto Romero to co-conspirator 1: Ill defenitely be out there Monday night tues morning

March 4<sup>th</sup> ,2017, send from Alberto Romero to co-conspirator 1: Call me when your up

March 4<sup>th</sup> ,2017, response from co-conspirator 1 to Alberto: I’m up man

A phone call from alberto to co-conspirator was made folliwng that text message. Co-conspirator 1 stated that Alberto called to confirm that marijuana product was availble and

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<sup>15</sup> Ops referring to high grade marijuana

<sup>16</sup> Gorilla glue is a high grade marijuana strand that is highly desired from many buyers

they agreed on \$1650 per each pound of marijuana. Alberto agreed to purchase 40 pounds of marijuana, which was destined for Texas.

March 7<sup>th</sup> 2017, sent from co-conspirator 1 to Alberto: 12:30 at the apartment<sup>17</sup> works. You gonna go grab a hotel first?

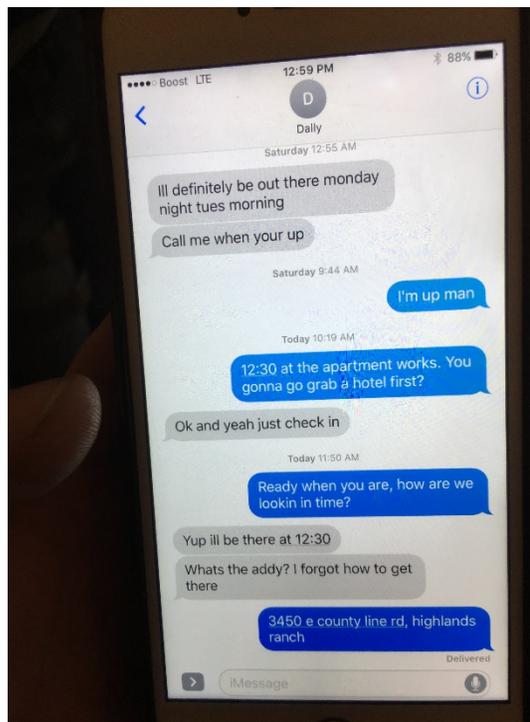
March 7<sup>th</sup> 2017, sent from Alberto to co-conspirator 1: Ok and yeah just check in

March 7<sup>th</sup> 2017, response from co-conspirator 1 to Alberto: Ready when you are, how are we lookin in time?

March 7<sup>th</sup> 2017, sent from Alberto to co-conspirator 1: Yup ill be there at 12:30

March 7<sup>th</sup> 2017, sent from Alberto to co-conspirator 1: Whats the addy? I forgot how to get there

March 7<sup>th</sup> 2017, response from co-conspirator 1 to Alberto: 3450 e. county line rd, highlands ranch



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<sup>17</sup> Apartment is the location in which they have conducted past illegal transactions of marijuana

### Daniel Jamaal Manu

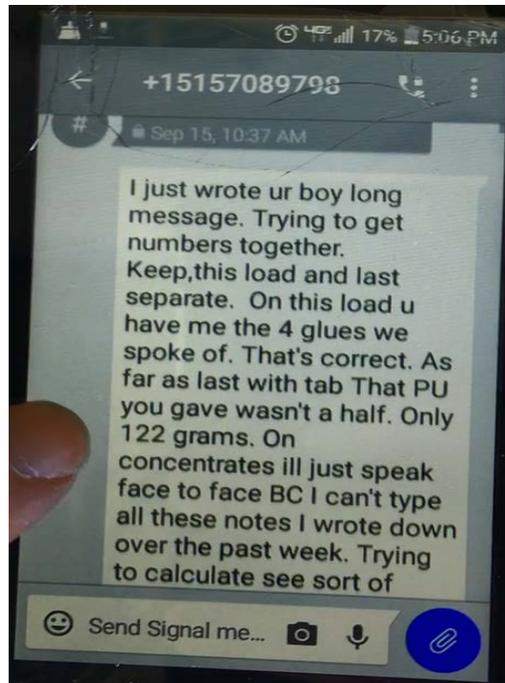
On March 7<sup>th</sup> 2017, Daniel Manu arranged to purchase 10 pounds of marijuana from the enterprise, specifically from co-conspirator 2. Daniel and co-conspirator 2 previously discussed and arranged for the purchase through telecommunication device and agreed the price would be \$2000 per each pound, for a total of \$20,000.00. Daniel also arranged to purchase a half of pound of marijuana concentrate at the price of \$1200. In addition Daniel, who has conducted numerous past illegal transactions for marijuana with enterprise members, owed co-conspirator 2 \$2000. The total amount Daniel was expected to bring to the illegal transaction on March 7<sup>th</sup> 2017, was \$24,000.00. On March 17<sup>th</sup> 2017 Daniel arrived at the pre-determined location and was contacted by members of law enforcement and in his possession was \$24,000.00. Daniel was also in possession of the telephone that co-conspirator 2 and Daniel used to unlawfully communicate to arrange the purchase of marijuana illegally. Daniel gave his consent to search his phone and text messages were found that related to the unlawful purchase of marijuana. Co-conspirator 2 estimated that during Daniel Manu's involvement as a member of the enterprise, he purchased over 100 pounds or more. The marijuana was going to be transported back to Iowa where it was going to be sold.

### Unlawful Use of Communication Facilities

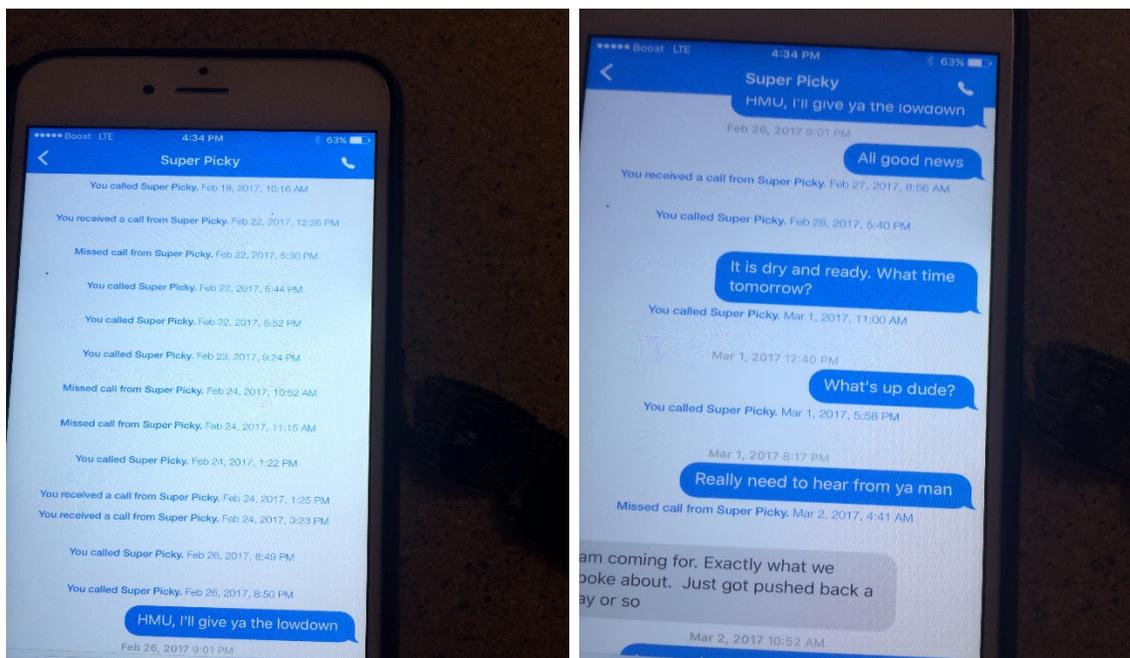
The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 4-7 .

Cell phone text messages recovered from the phone belonging to Daniel Manu dated back to September 15<sup>th</sup> 2016 10:37 am

On September 15<sup>th</sup> 2016 Daniel Manu sent co-conspirator 2 had the following conversation via text message:

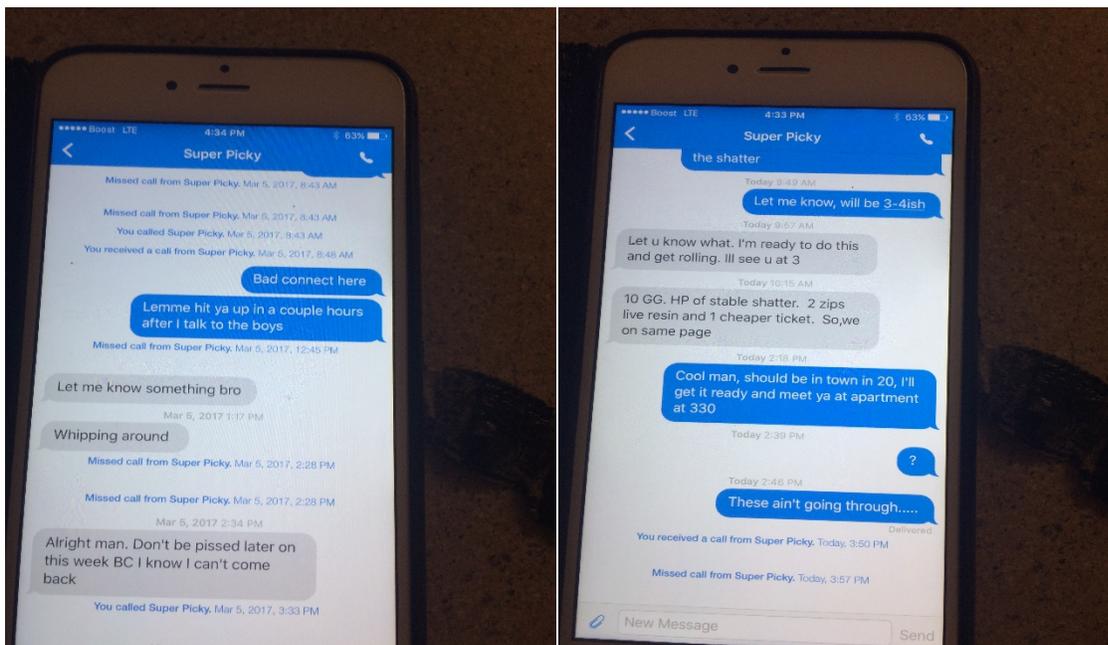
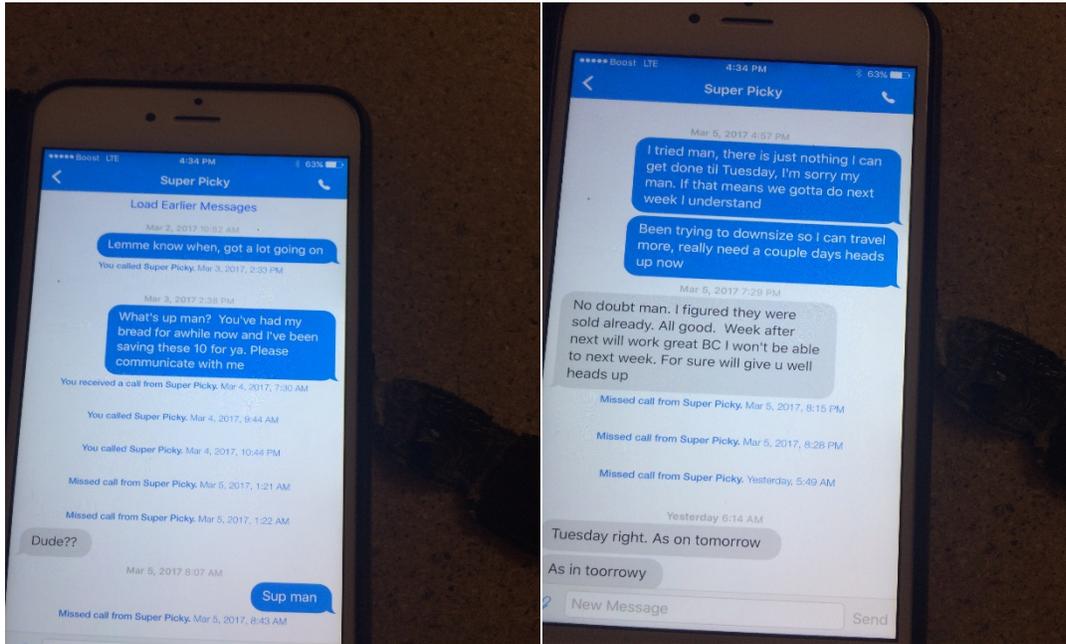


On February 26<sup>th</sup> and March 1<sup>st</sup> 2017, Daniel Manu and co-conspirator 2 had the following conversation via text message; in addition phone calls were made to one another<sup>18</sup>:

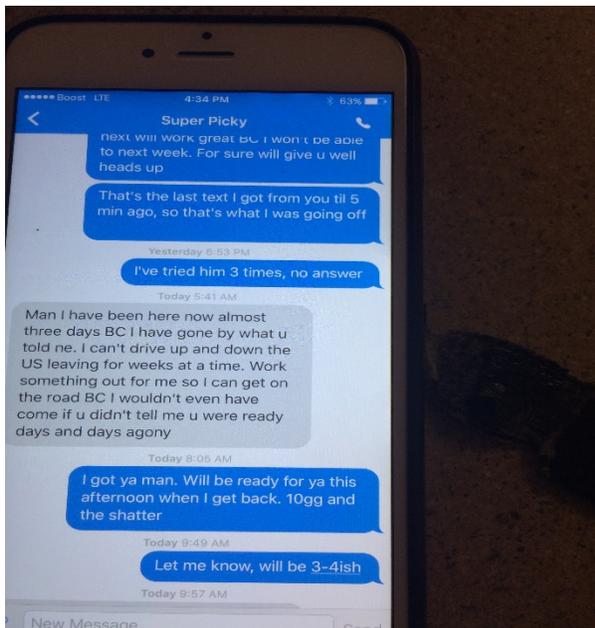


<sup>18</sup> The reader should note that co-conspirator 2 gave Daniel the nickname “super picky” due to him being so picky when selecting the strand of marijuana

On March 2<sup>nd</sup> 2017, March 3<sup>rd</sup> 2017, March 5<sup>th</sup> 2017, March 6<sup>th</sup> 2017, and March 7<sup>th</sup> 2017, Daniel Manu and co-conspirator 2 had the following conversation via text message<sup>19</sup>:



<sup>19</sup> The reader should note that the text message that read “yesterday” refer to March 6<sup>th</sup> 2017 and the text message that read “today” refer s to March 7<sup>th</sup> 2017.



Brian Jermaine Alexander and Miyoshi Moorer

On March 7<sup>th</sup> 2017, Brian Alexander arranged to purchase 5 pounds of marijuana from the enterprise, specifically from co-conspirator 2. Brian and co-conspirator 2 previously discussed and arranged for the purchase through telecommunication device and agreed the price would be \$2000 per each pound, for a total of \$10,000.00. Co-conspirator 2 stated that Brian and his girlfriend, later identified as Miyoshi Moorer typically travel to Colorado via airplane, and after purchasing the marijuana they will ship it back to their home state, unknown address. Brian and co-conspirator 2 have met on over 8 occasions, and Brian would normally purchase 5 pounds of marijuana each transaction, Brian would at times have marijuana given to him on top of what he paid for, on the basis he pay co-conspirator 2 the next time he returns to buy marijuana the next time. Co-conspirator 2 has estimated that Brian has purchased well over 50 or more pounds during his involvement with the enterprise. The total amount Brian was expected to bring to the illegal transaction on March 7<sup>th</sup> 2017, was \$10,000.00. On March 17<sup>th</sup> 2017 Brian and Myoshi arrived at the pre-determined location in a rental vehicle. Brian and Myoshi immediately walked to the front door where the deal was set to take place, there they were contacted by members of law enforcement. In Myoshi's possession was a bag that the enterprise used and sold, known as "dope bags". Inside the bag was \$10,000.00 in cash. The phone used to unlawfully communicate to arrange the purchase of marijuana illegally with co-conspirator 2 was found to be in Brian's possession. A search of the vehicle that Brian and Myoshi arrived in revealed evidence to support co-conspirators claim that the marijuana Brian and Myoshi purchase is shipped back to where they live. Inside the vehicle Detectives located numerous unused United States

Postal boxes, packing tape, food saver bags<sup>20</sup>, a new unopened box of latex gloves, a pair of unopened scissors, and snuggles dryer sheets<sup>21</sup>. The marijuana was destined to be transported back to North Carolina.

### Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 8-12 .

Conversations that were recovered from co-conspirators phone date back to December 25<sup>th</sup> 2016. In these text messages Brian and co-conspirator 2 talk about Brian returning back next month to see co-conspirator 2 in order to make another purchase of marijuana. <sup>22</sup>

On December 25<sup>th</sup> 2016, Brian and co-conspirator 2 had the following conversation via text message:

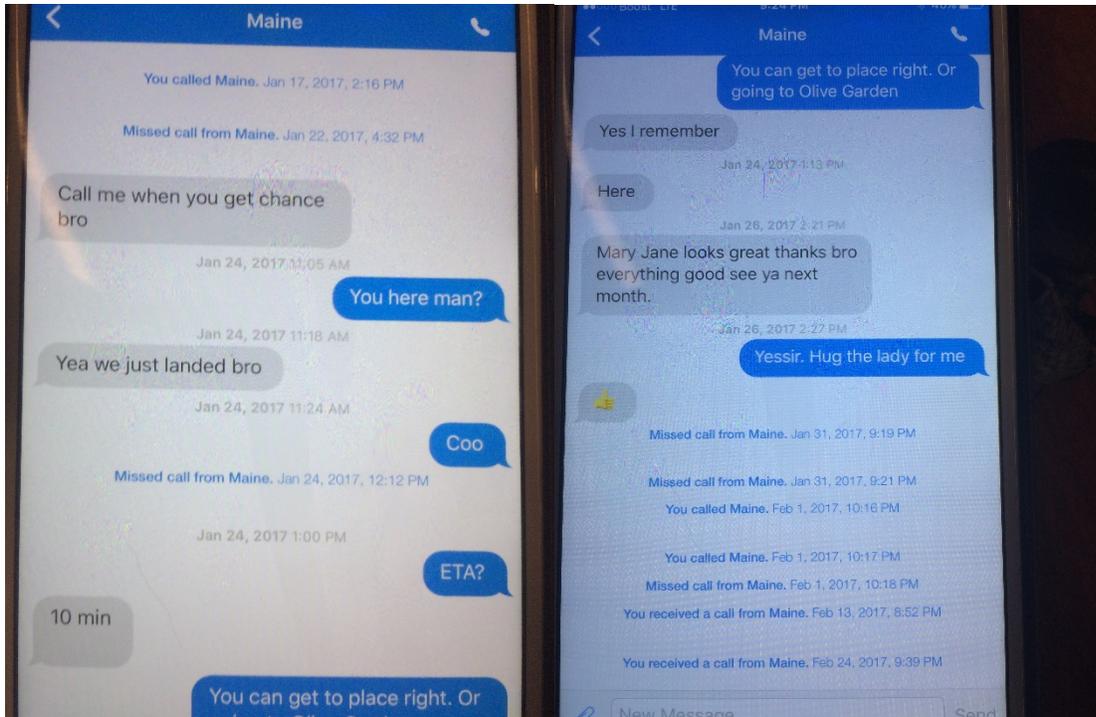


On January 22<sup>nd</sup> 2017 and January 24<sup>th</sup> 2017, and January 26<sup>th</sup> 2017, Brian and co-conspirator 2 had the following conversation via text message:

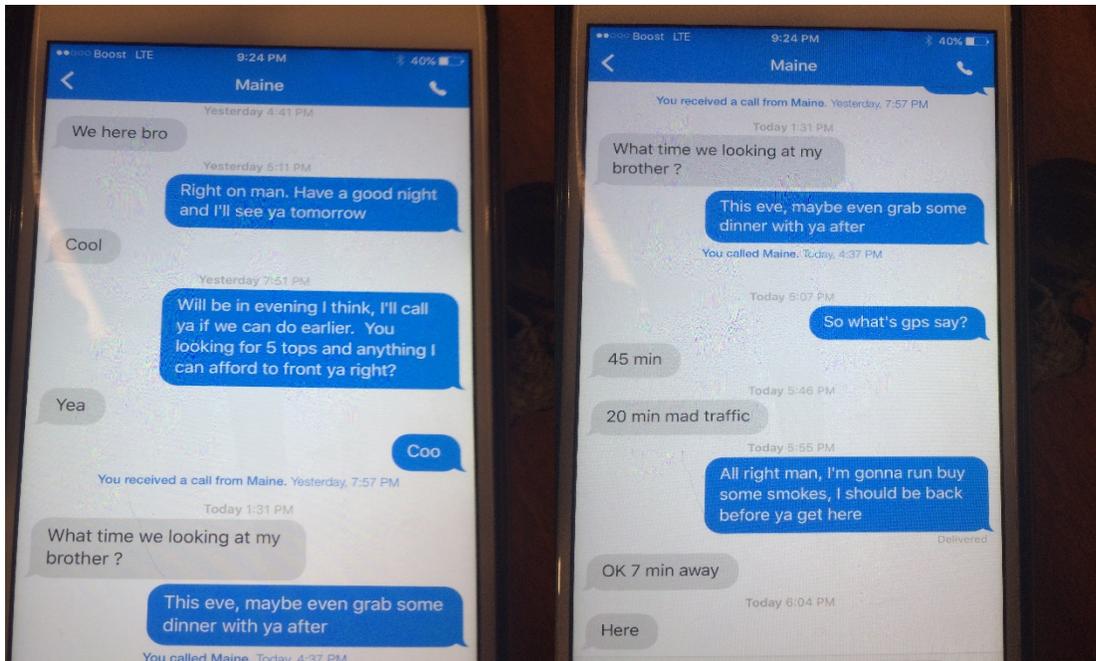
<sup>20</sup> These bags are commonly used to seal the marijuana and conceal the smell to avoid detection by Law Enforcement

<sup>21</sup> Another common item used to mask the smell of marijuana from emitting from the packaging material.

<sup>22</sup> The recipient of the text message show the recipient identified as “Maine” , which is the name co-conspirator 2 referred to Brian Jermaine Alexander as, since he introduced himself as Jermaine.



On March 6<sup>th</sup><sup>23</sup> 2017 and March 7<sup>th</sup><sup>24</sup> 2017 Brian and co-conspirator 2 had the following conversation via text message:



<sup>23</sup> The text messages that read “yesterday” are text messages sent/received on March 6<sup>th</sup> 2017.

<sup>24</sup> The text messages that read “today” are text messages sent/received on March 7<sup>th</sup> 2017.

Miyoshi Moorner's deceitful story revolved around a claim to law enforcement agents (Detective Holmes) that she owned half the money found in the bag she showed up with. The money was going to be used for gambling, to buy alcohol, pot and rent rooms. However, in contrast to her assertions to the above named law enforcement officer, text messages coupled with prior buys for marijuana where she was present, were all indicative and proved that the reason for her and Brian's travel to Colorado was to purchase marijuana from the enterprise.

Brian Jermaine Alexander's deceitful story occurred when he was interviewed by Law Enforcement Officers. Brian stated he was out in Colorado to have some drinks with co-conspirator 2 who he has known for about 1 ½ years to 2 years. Brian said that he meet co-conspirator 2 in a bar originally. He denied calling co-conspirator 2 with the phone that was in the interview room stating he used a different phone but denied having any other phones. Brian denied the money was his even though his wife Miyoshi told Detectives that the money was his money. Brian became very defensive when confronted with discrepancies and continued to deny involvement. However, in contrast to his assertions to the above named law enforcement officer, text messages and calls support and show that Brian's reason for meeting with co-conspirator 2 was to purchase marijuana unlawfully.

#### Vincent Bernette Casey

On March 8<sup>th</sup> 2017 Vincent and co-conspirator 1 arranged for the purchase of 2 ¼ pounds of marijuana and marijuana concentrate at an approximate price of \$5000, with \$300 being due from a previous purchase of marijuana. The total amount would have been around \$5,300.00 and past debt. Vincent arrived at the apartment around 1310 hours on March 8<sup>th</sup> 2017. In Vincent's possession was \$5341.00 in cash, which was seized. The money was found in the bag Vincent was carrying. This bag was recognized as a "dope bag"<sup>25</sup>. The evidence obtained from the co-conspirator, to include text messages sent and received from Vincent's phone, information, and Vincent's actions, is evidence that Vincent participated in an illegal enterprise on numerous occasions. Co-conspirator 2 estimated that Vincent has made purchases that total over 50 or more pounds of marijuana. The usual amount of marijuana Vincent purchased ranged from 2 pounds to 4 pounds.

#### Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 13-16 .

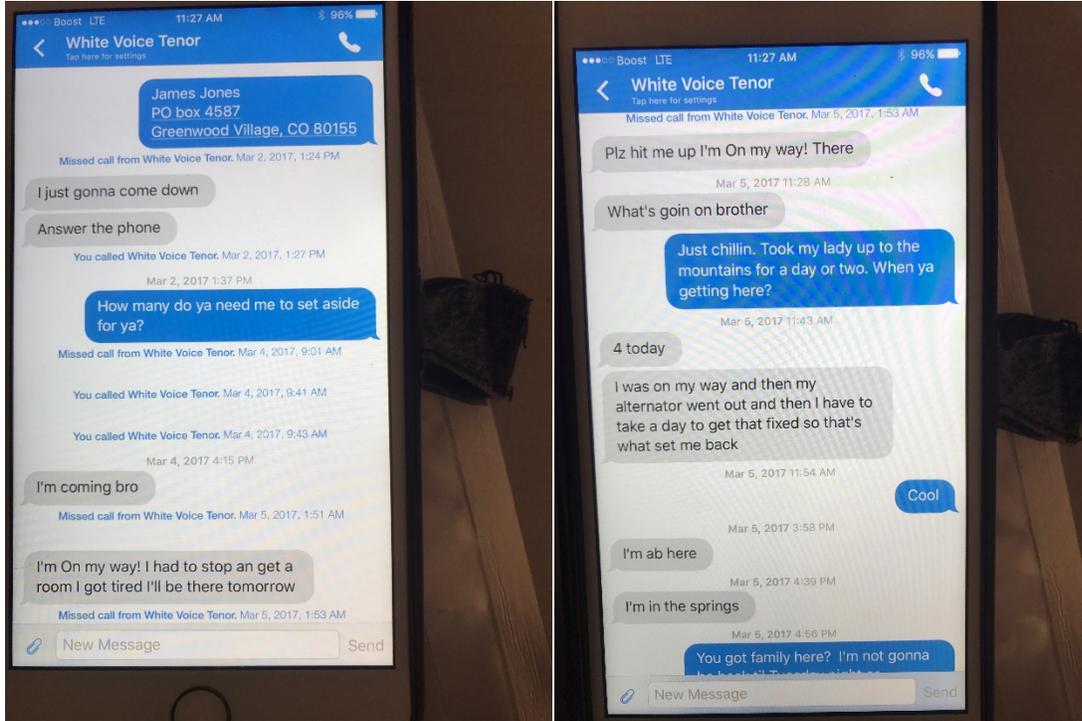
The number that co-conspirator 2 contacted Vincent at was 720-724-6895. Co-conspirator 2 said that Vincent told him that phone was specifically used to communicate with him for marijuana purchases. Between March 2<sup>nd</sup> 2017, and March 8<sup>th</sup> 2017, co-conspirator 2 and

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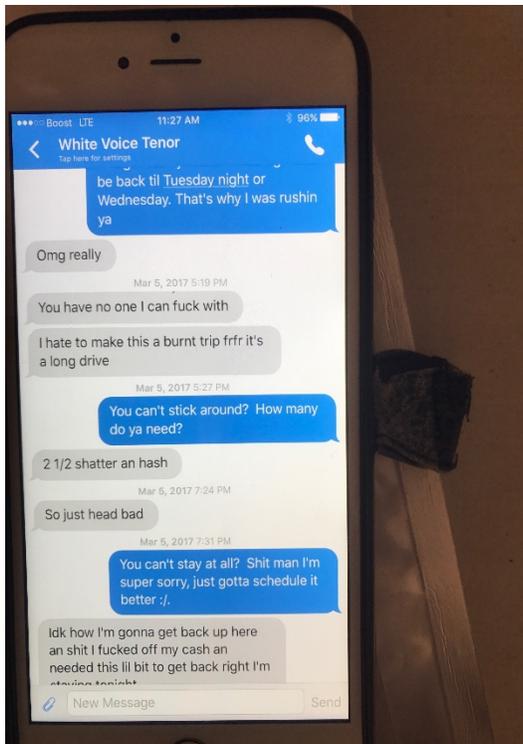
<sup>25</sup> These bags are charcoal lined bags that are easily identified as bags sold by the CI and other enterprise members when they sold marijuana to customers, such as Vincent. The enterprise called them "dope bags".

Vincent communicated via text message to arrange and confirm the sale and purchase of marijuana.

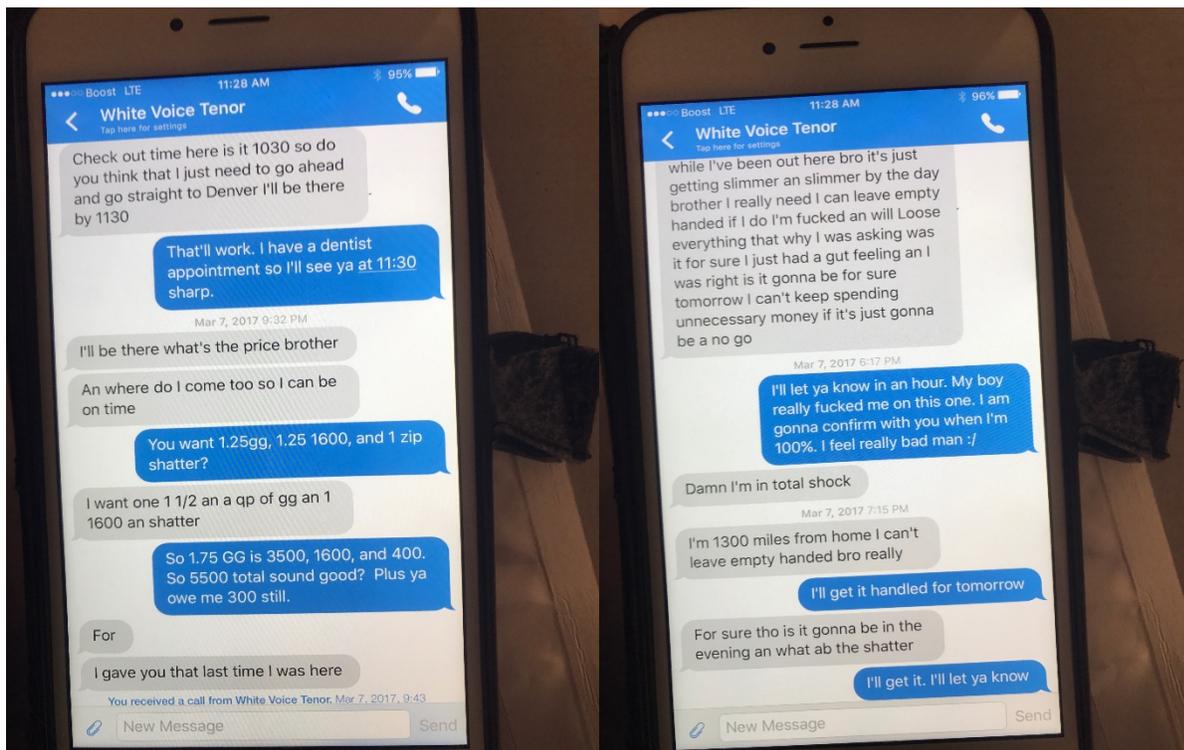
On and between March 2<sup>nd</sup> 2017 and March 5<sup>th</sup> 2017, Vincent and co-conspirator 2 had the following conversation via text message: <sup>26</sup>

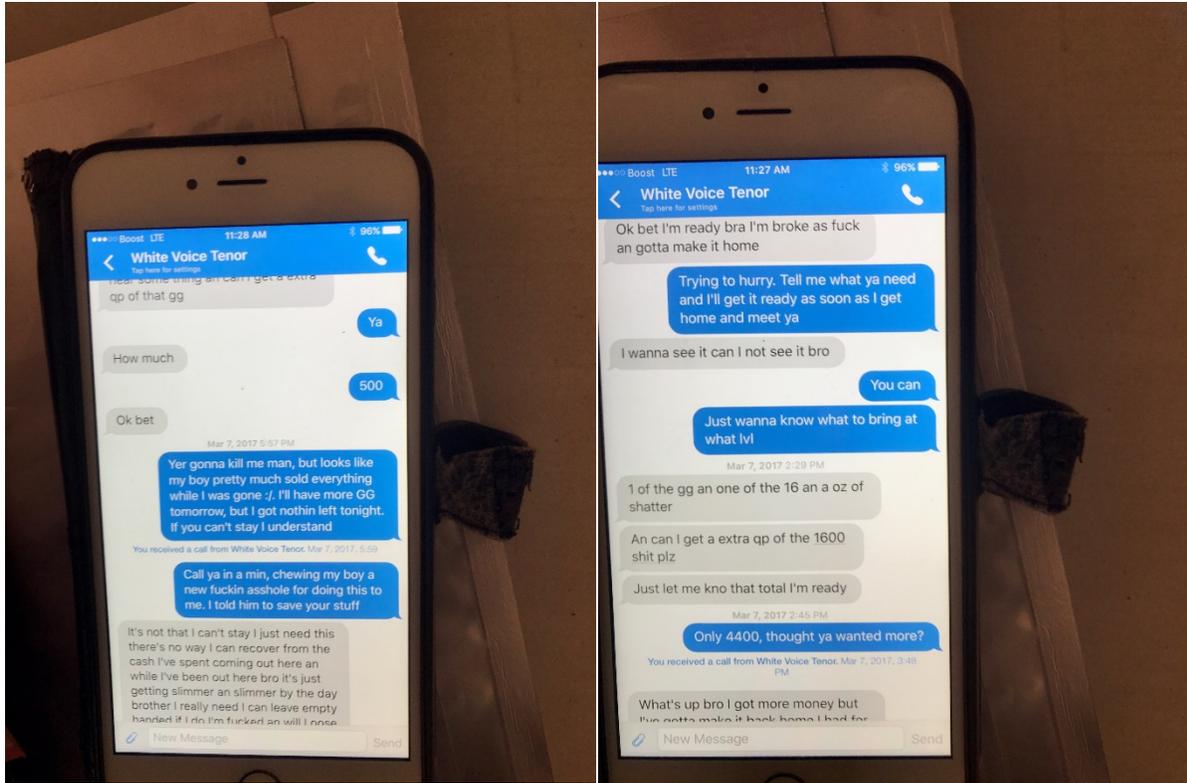


<sup>26</sup> The reader should know that listed name of "White Voice Tenor" in the text messages is how co-conspirator 2 listed the contact of Vincent in his phone.

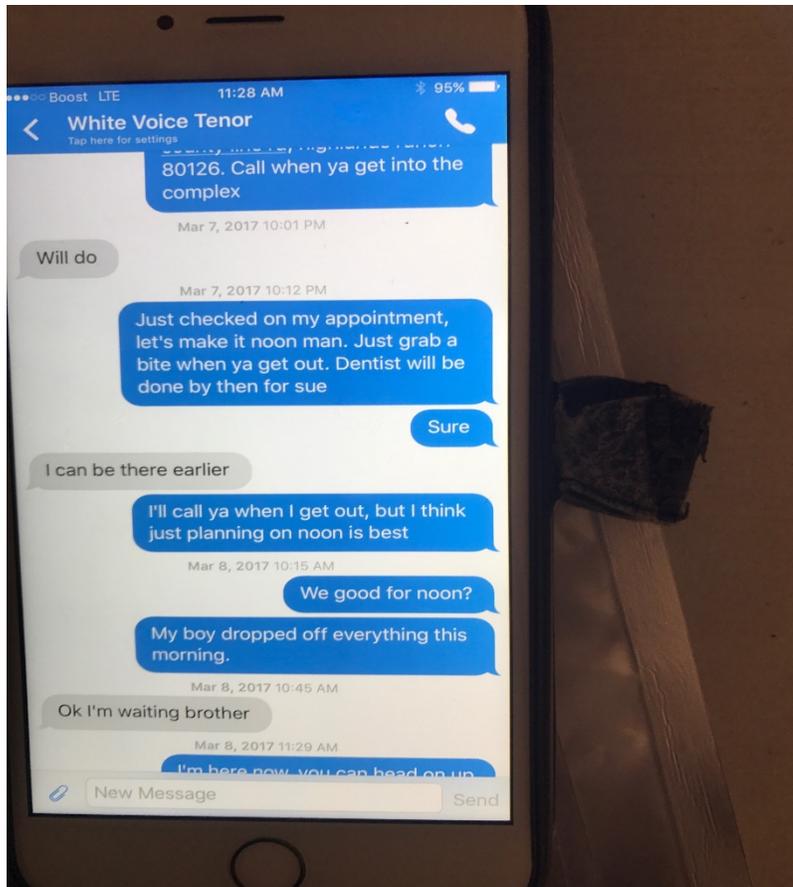


On March 7<sup>th</sup> 2017, Vincent and co-conspirator 2 had the following conversation via text message:





On March 8<sup>th</sup> 2017, Vincent and co-conspirator 2 had the following conversation via text message:

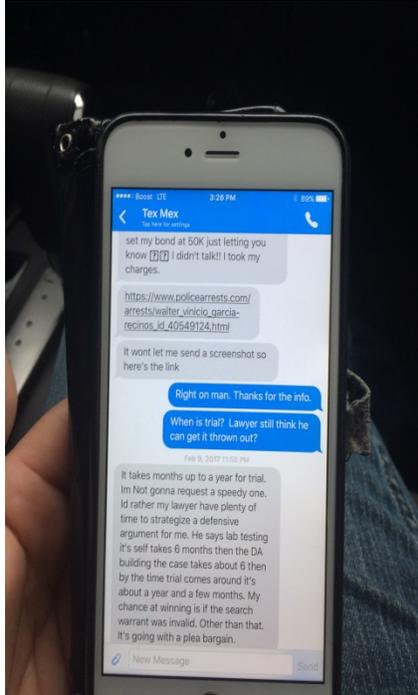
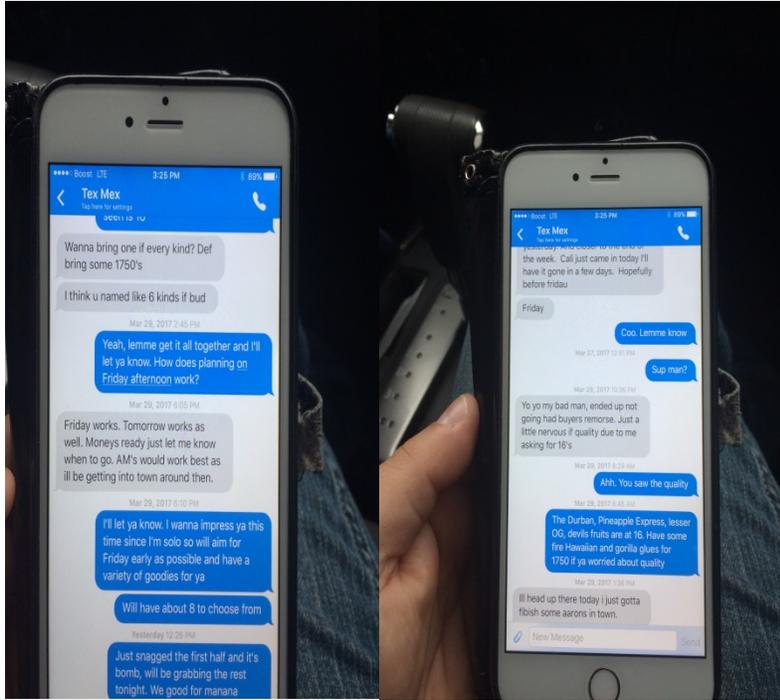


Vincent Casey's deceitful story occurred when he was interviewed by Law Enforcement Officer, Parker Police Detective Cleveland Holmes. Vincent stated that the individual he was coming to see at the County Line apartment was going to supply him with a gram of wax. He identified this individual as 'Douglas' and he initially made contact with him online. Vincent described 'Douglas' as a Mexican American but he has only met Douglas in the dark so he could not describe him very well. Vincent also believed that Douglas may have been using a voice modulator while he was speaking to him on the phone. This was going to be the second time that Vincent was going to meet Douglas. He met Douglas months ago. However, in contrast to his assertions to the above named law enforcement officer, text messages and Vincent's later admission of his true intentions to purchase a large quantity of marijuana proved Vincent was being deceitful.

#### Walter Recinos Garcia

On 03-31-2017, IMPACT setup a controlled purchase using co-conspirator 1, with a male identified as Walter Garcia, from Amarillo, Texas. Walter has been identified as a main source of supply of marijuana for Amarillo, Texas. Per co-conspirator 1, Walter had previously bought marijuana from the enterprise multiple times. On this occasion, Walter agreed to purchase 6 pounds of marijuana from the co-conspirator 1 at \$1700 per pound, for a total of \$10,200.00. At approximately 1624 hours, Walter told the co-conspirator 1 he was arriving at the apartments. At that time a gold Honda accord arrived bearing Texas license





Walter's gave a subsequent interview, wherein he stated he had over 10k in cash and that he was there to purchase a Subaru Impreza and the cash was to be used for that purpose.

### Layth Mamdouh and Ammar Niazey

On or between March 3<sup>rd</sup> and March 22<sup>nd</sup> 2017, Layth Mamdouh arranged to purchase 11 pounds of marijuana from the enterprise, specifically from co-conspirator 2. Layth and co-conspirator 2 discussed and arranged for the purchase through telecommunication device and agreed the price would be \$2000 per each pound, for a total of \$22,000.00. Layth and enterprise member Ammar Niazey, traveled from New York to Douglas County Colorado via vehicle in order to purchase the 11 pounds of marijuana unlawfully Co-conspirator 2 knew Layth was from New York, based on past conversations he had with Layth and since he has shipped marijuana to him in New York. Co-conspirator 2 also knew Layth has driven a vehicle that had New York license plates attached. The CI stated that he met Layth approximately 5 months ago, after Layth responded to a craigslist ad that was posted by the enterprise. When they first met, Layth drove from New York to meet Co-conspirator 2 and other known members of the enterprise and purchased approximately three pounds. Layth again drove back to Colorado shortly after and purchased approximately 10 pounds from Co-conspirator 2. The two deals were done at the same location that LAyth and Ammar arrived at on March 22<sup>nd</sup> 2017. After Layth made the trip to Colorado two times, the enterprise agreed to start shipping marijuana to Layth in New York. Co-conspirator 2 shipped Layth four packages via US mail. The amounts of marijuana shipped varied. The CI said Layth would provide him various address in New York, and different names when Layth requested shipping. Layth always sent the packages to the P.O. Box the enterprise controlled. Layth, Ammar and another male, Ahmed Mamdoh, were contacted in front of the apartment where the illegal purchase of marijuana was set to take place. In Layth's possession was \$16,000.00 and in Ammar's possession was \$6,800.00, for a total of \$22,800.00. The phone used to facilitate and arrange for the unlawful purchase was found to be in Layth's possession. Layth admitted his role in the enterprise and stated that his intentions were to take the marijuana back to New York and sell at a higher price. The number Layth used to communicate with co-conspirator 2 was 585-410-0955<sup>27</sup>

### Unlawful Use of Communication Facilities

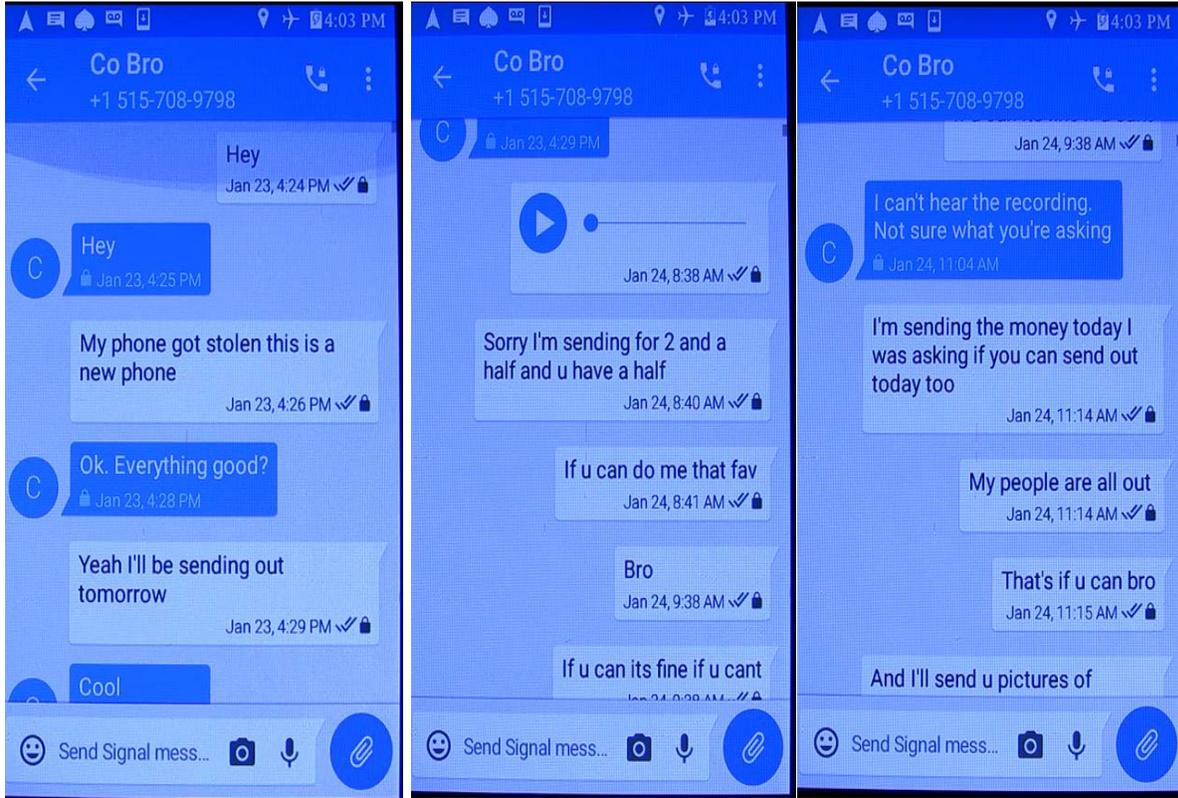
The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 17-20 .

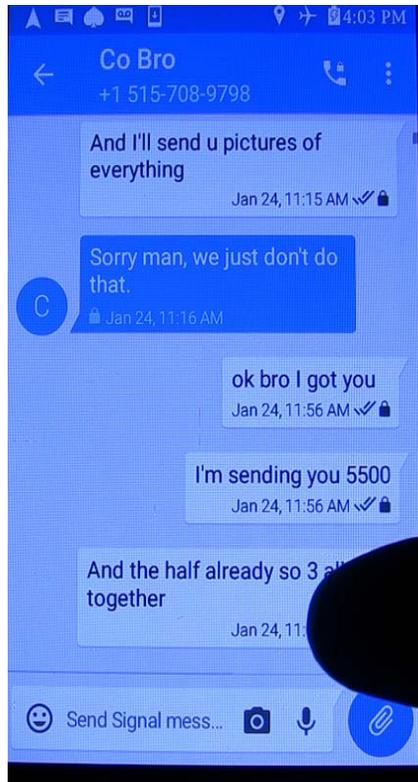
On or between Janaury 23<sup>rd</sup> 2017 and January 24<sup>th</sup> 2017, Layth and co-conspirator 2 had the following conversation via text message recovered from Layth's phone<sup>28</sup>:

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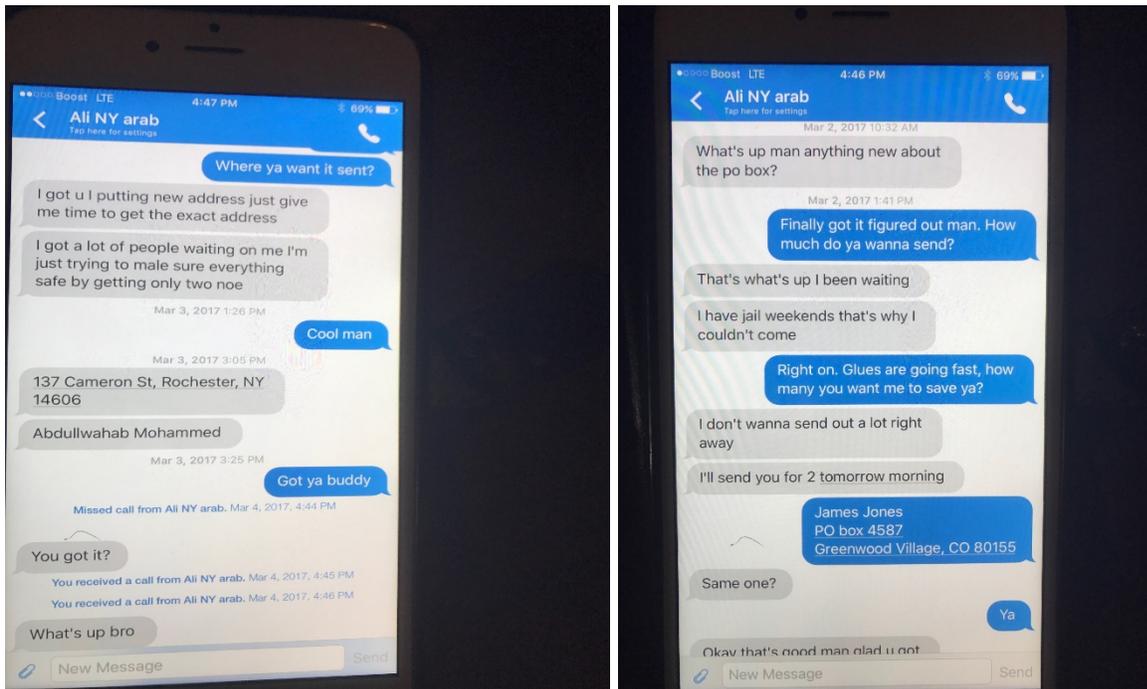
<sup>27</sup> The text message shows the recipient identified as "Ali Ny Arab" , which is the name co-conspirator 2 referred to and listed Layth as a contact in his phone.

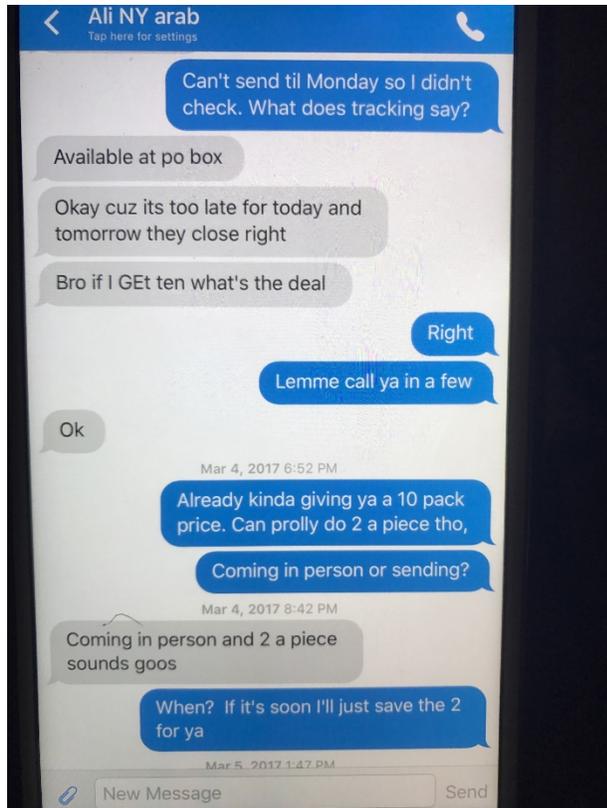
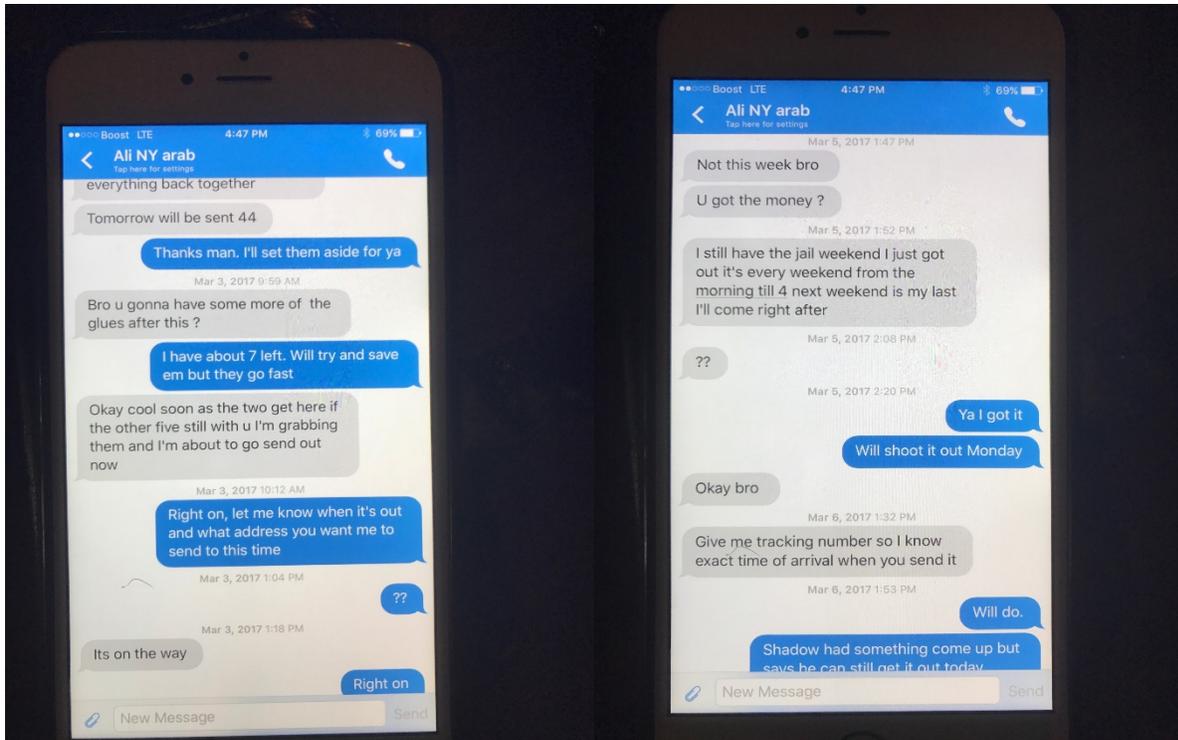
<sup>28</sup> Layth had co-conspirator 2 listed under his contacts as "Co Bro"



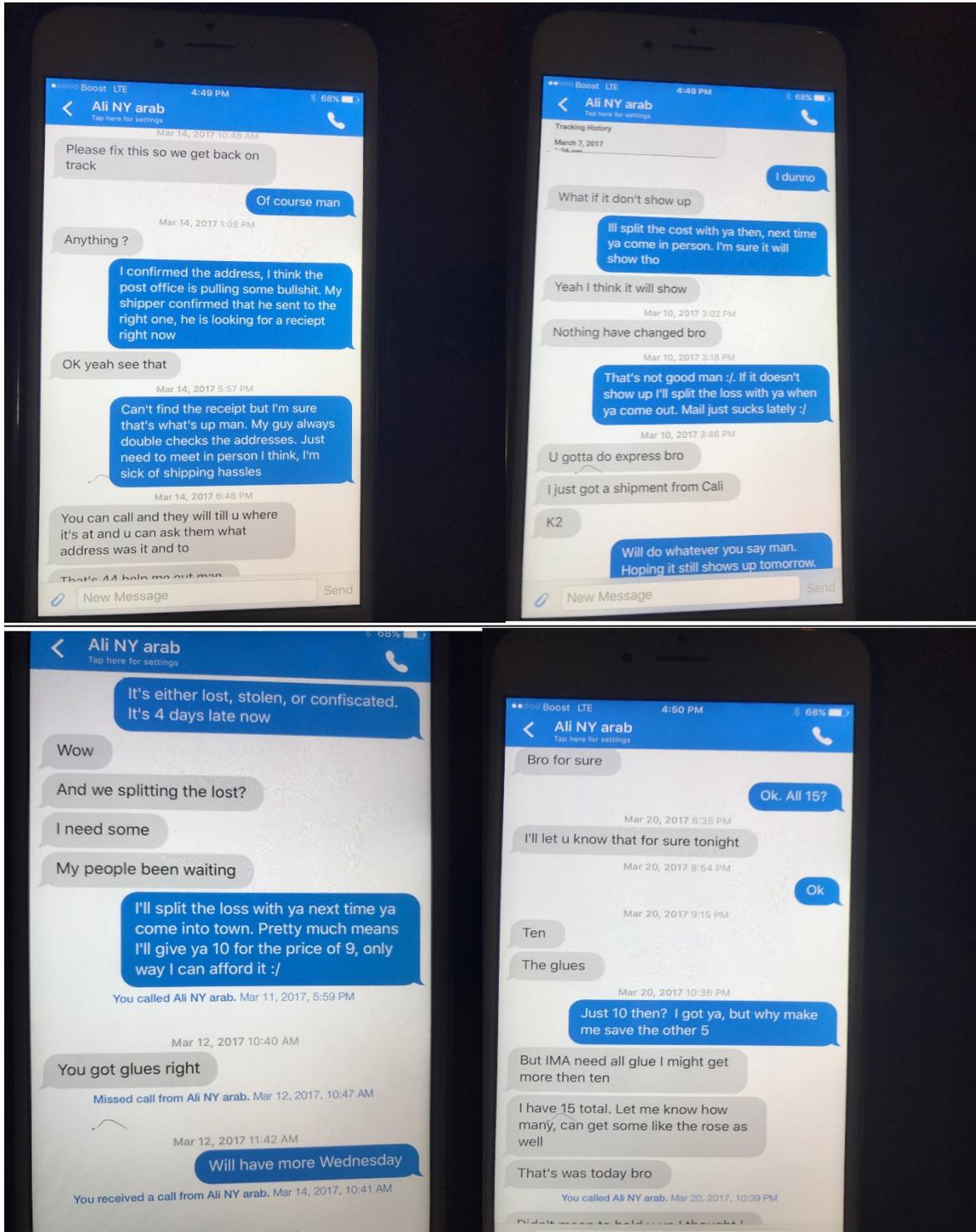


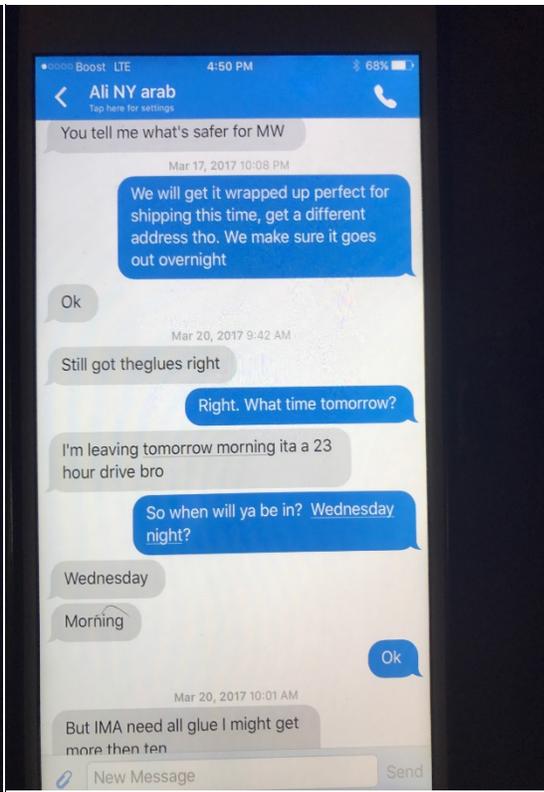
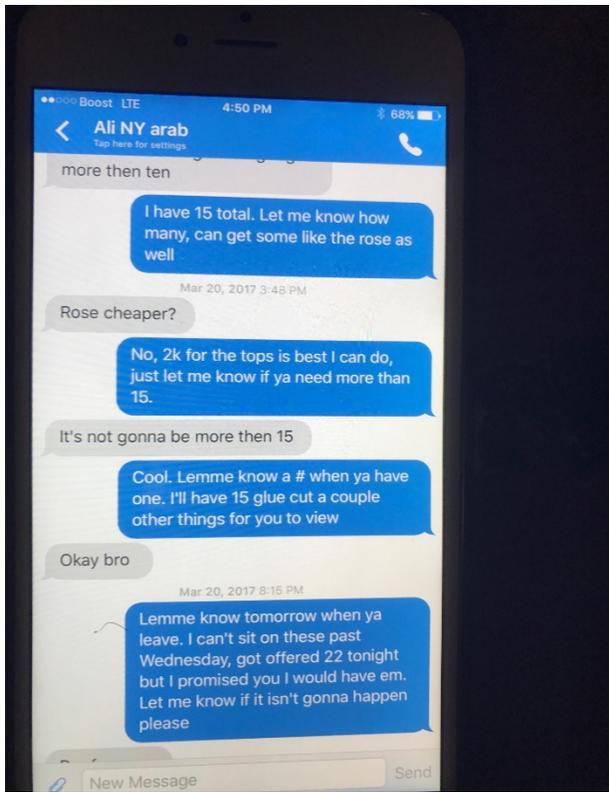
On or between March 2<sup>nd</sup> 2017 and March 6<sup>th</sup> 2017, Layth and co-conspirator 2 had the following conversation via text message:



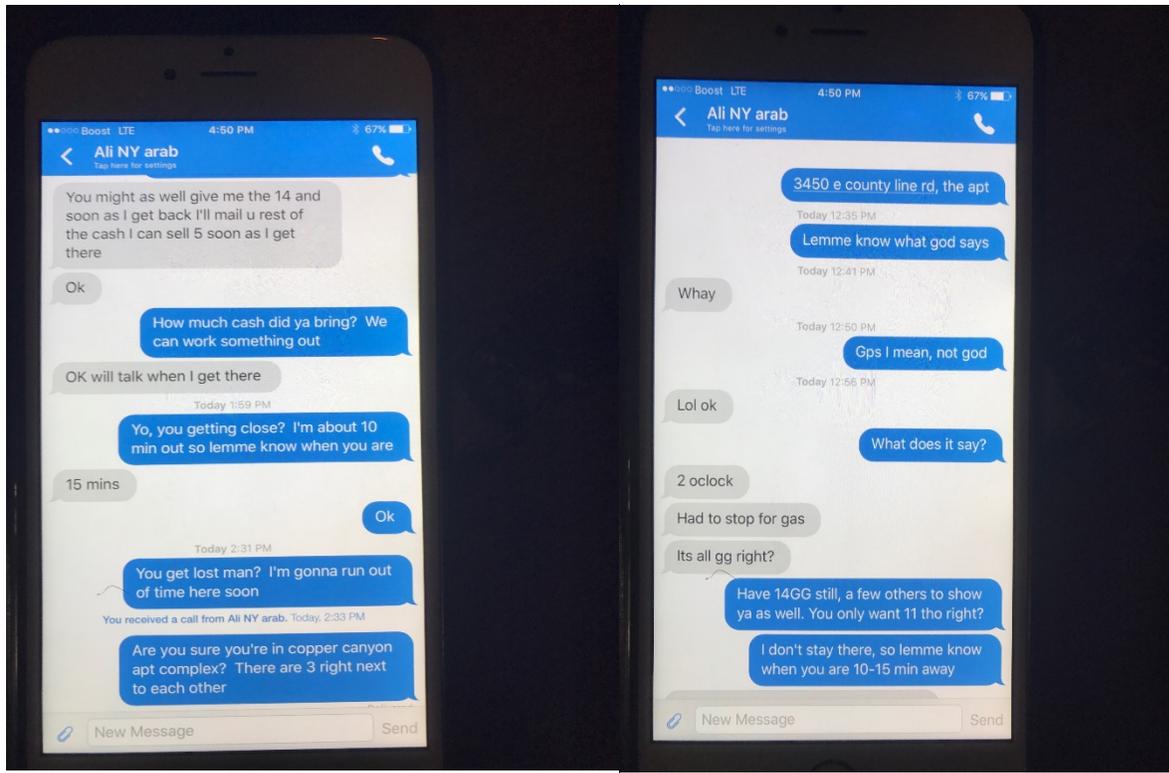


On or between March 10<sup>th</sup> 2017 and March 20<sup>th</sup> 2017, Layth and co-conspirator 2 had the following conversation via text message:





On March 22<sup>nd</sup> 2017, Layth and co-conspirator 2 had the following conversation via text message:



Layth admitted to his role in the enterprise. Ammar Niazey provided Law enforcement officers with a story that revolved around him coming out to Colorado to buy gold. Ammar had cash on his person, and his cash plus the cash Layth had, combined, would be enough money to purchase the amount of marijuana as discussed in the above referenced predicate acts.

<sup>29</sup> The text messages that read "today" are referring to the date of March 22<sup>nd</sup> 2017.

## Andrew Baldwin, Jayson King, Richard Sweetman

On April 10<sup>th</sup> 2017, Andrew Baldwin arranged for the purchase of 12 pounds of marijuana at \$1950 per pound. Andrew had previously sent a driver (Richard Sweetman) to pick up the marijuana and April 10<sup>th</sup> 2017 he sent Jayson King and Richard Sweetman to pick up and transport the marijuana back to Iowa. Andrew and co-conspirator 2 and co-conspirator 1 previously discussed and arranged for the purchase through telecommunication device. The number Andrew used to communicate was 641-831-3180. On April 10<sup>th</sup> 2017, under the direction of Andrew Baldwin via telephone, Richard Sweetman and Jayson King arrived at a previously discussed location where they were to purchase 12 pounds of marijuana for a total of \$23,400. Jayson and Richard were detained in a truck that belonged to Andrew Baldwin. Jayson had a large amount of cash on his person when contacted, specifically \$22,900.00 in cash. Inside the back of Andrews truck was a grey colored bag, which Detectives knew as a “dope bag”. As mentioned several times in the above pages, the dope bag is a unique bag sold by the enterprise. Richard was interviewed and admitted that he was paid \$500 to pick up the marijuana and transport it back to Iowa, where it was to be sold. Richard identified Andrew, and assumed he was involved because they were driving his truck. Richard never knew how much marijuana he was picking up and taking back. Richard admitted he made two other trips where he made \$500 on each of those trips. Richard stated that Jayson was the person who hired him to pick up marijuana from Colorado and transport it back to Iowa. Co-conspirator 1 and co-conspirator estimated that Andrew has purchased over 100 pounds of marijuana during his involvement in the organization. One specific purchase of marijuana occurred when Andrew paid the co-conspirators extra money to bring the marijuana to Iowa. Co-conspirator 1 drove 21 pounds of marijuana to a hotel in Des Moines, Iowa and met with Andrew Baldwin. Andrew paid \$2500.00 per each pound for a total of \$52,500.00. Text messages supporting this transaction were recovered from co-conspirators phone. The number co-conspirators 1 and 2 used to arrange the purchase and sale of marijuana with Andrew was further confirmed to belong to Andrew on 05-30-2017. Andrew contacted Law Enforcement agents inquiring about his impounded truck and left that same number, 640-831-3180, to contact him back. Detective Galvan contacted him on 05-30-2017 and Andrew verbally identified himself to Detective Galvan.<sup>30</sup>

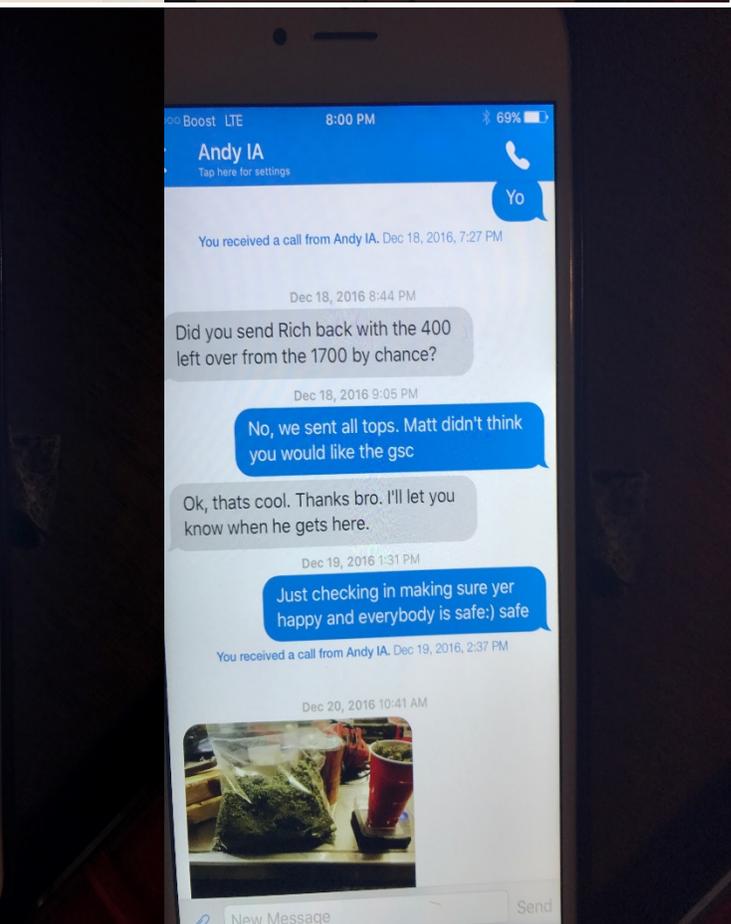
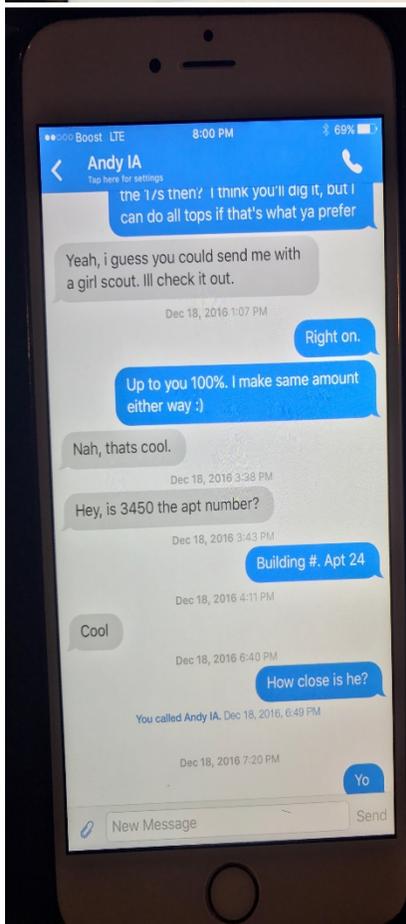
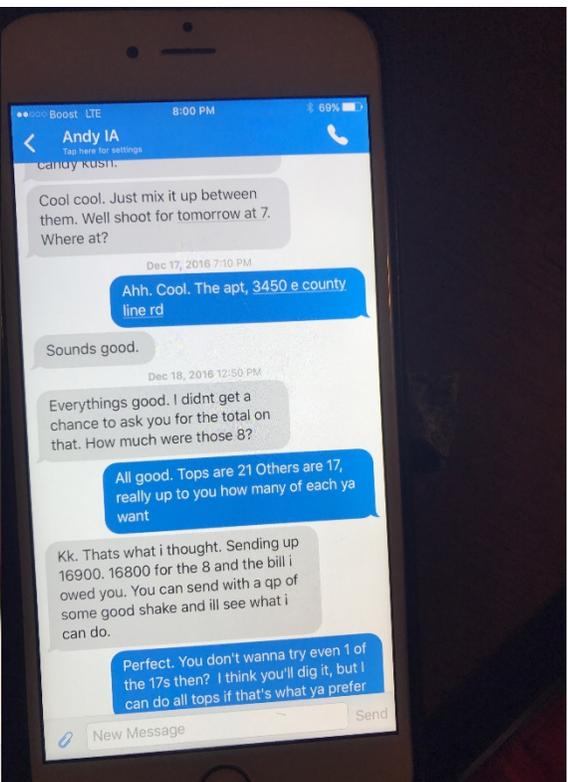
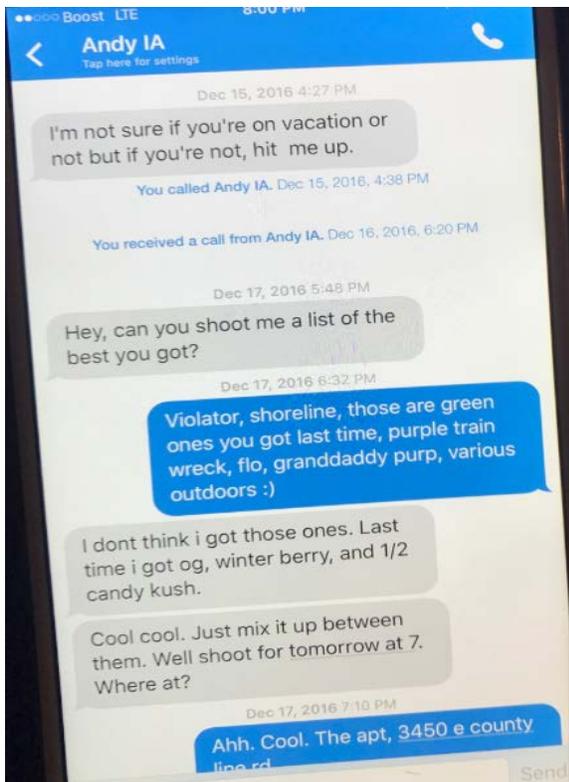
## Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 21-27 .

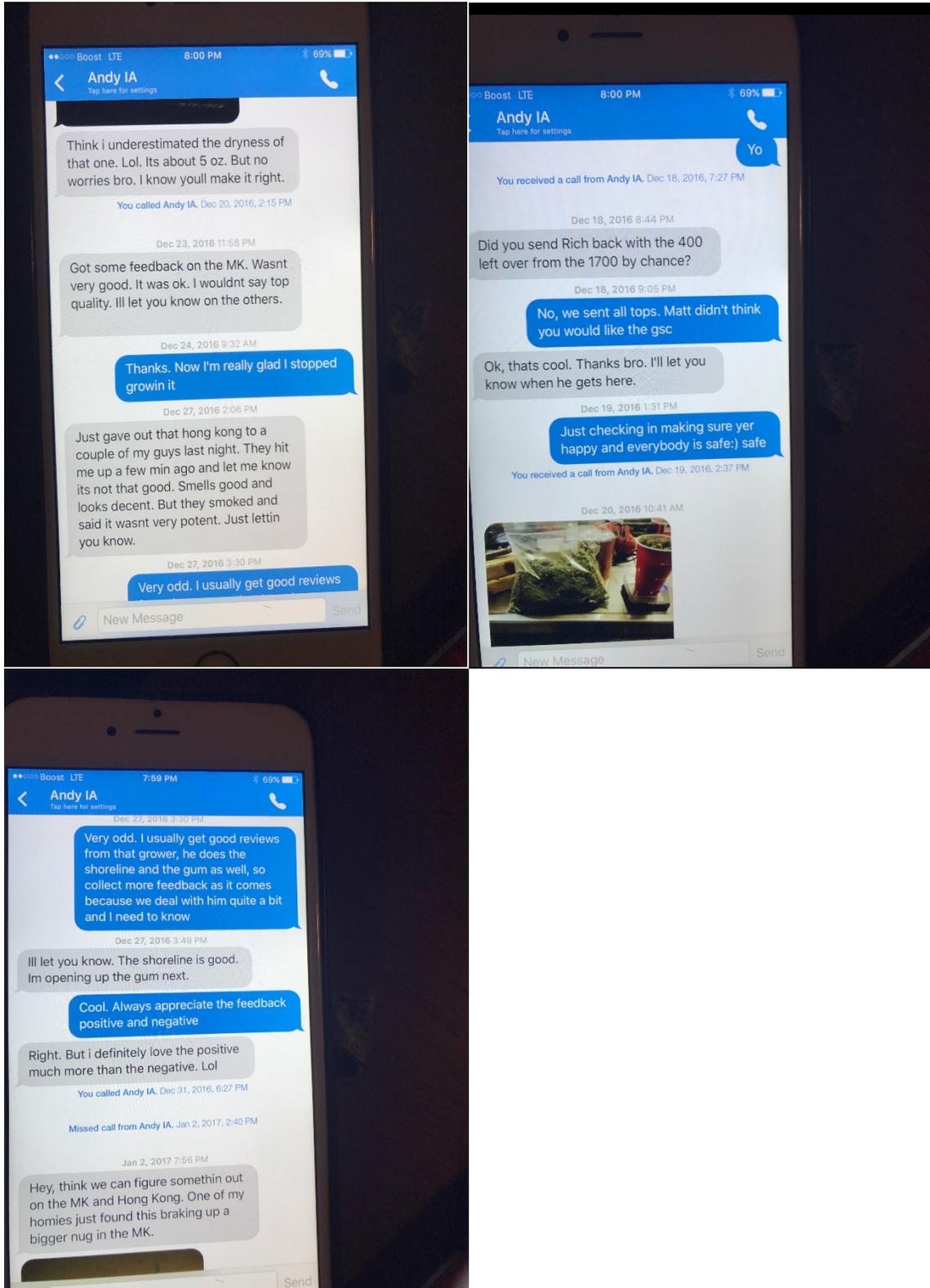
On or between December 15<sup>th</sup> 2016 and December 19<sup>th</sup> 2016 Andrew Baldwin and co-conspirator 2 had the following conversation via text messages:

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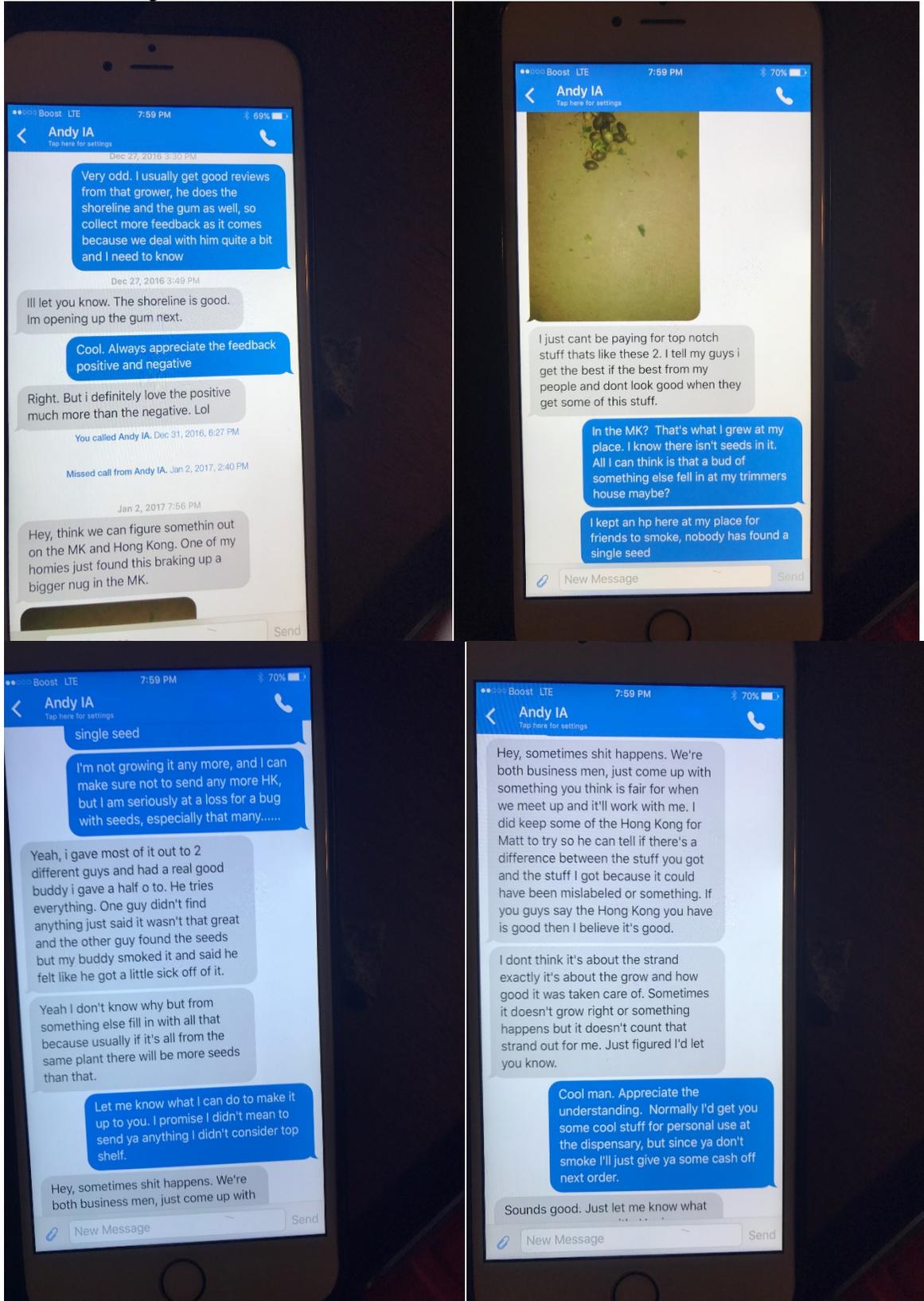
<sup>30</sup> The text message shows the recipient identified as “Andy IA” , which is the name co-conspirator 2 referred to and listed Andrew Baldwin as a contact in his phone.



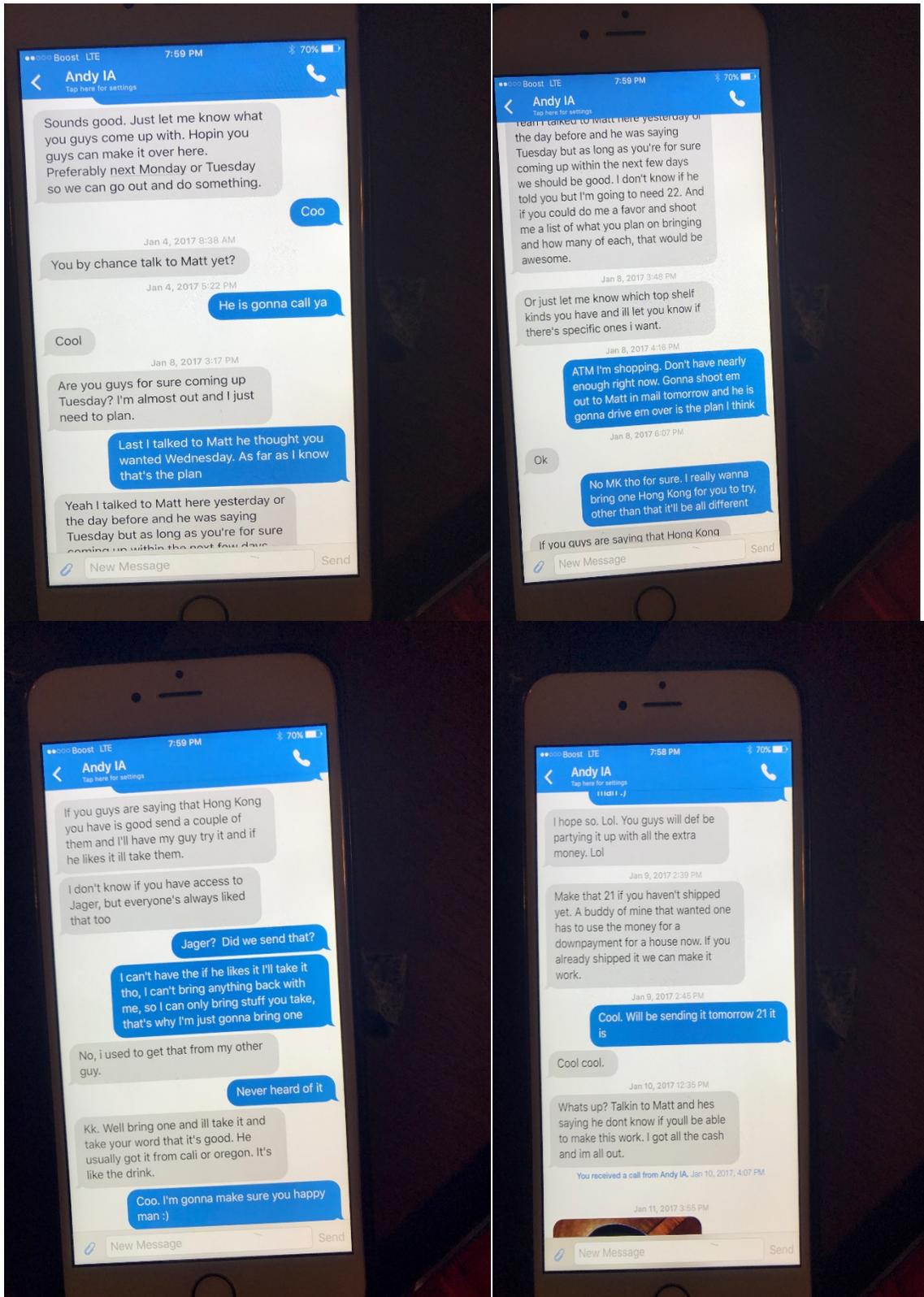
On or between December 20<sup>th</sup> 2016 and December 31<sup>st</sup> 2016 Andrew Baldwin and co-conspirator 2 had the following conversation via text messages:

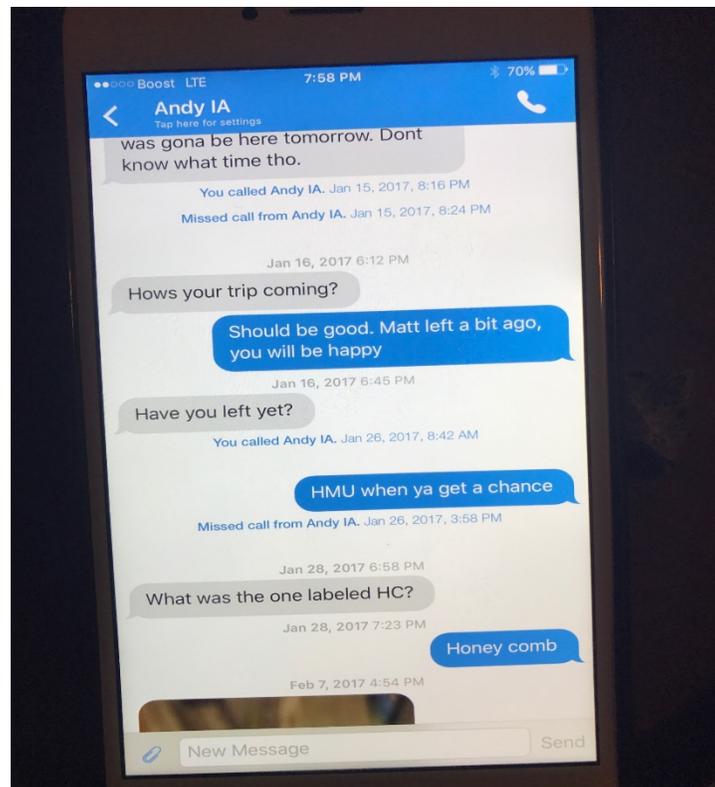
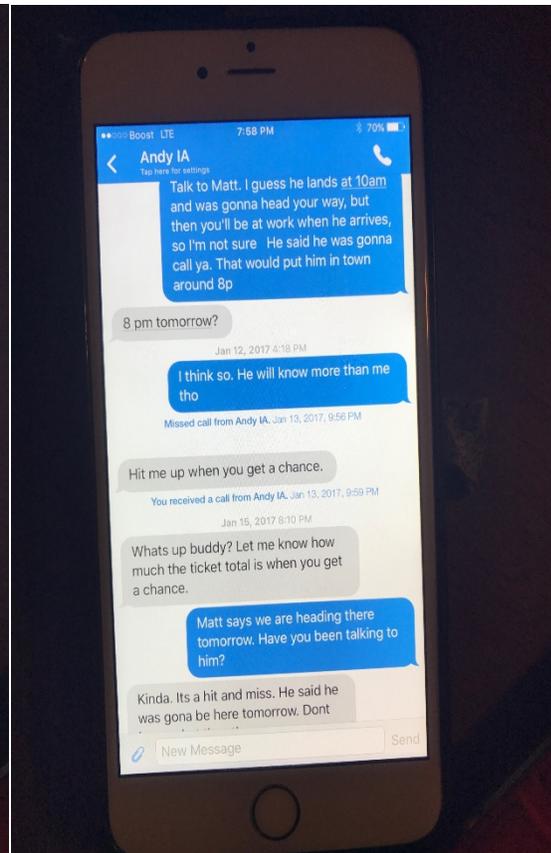
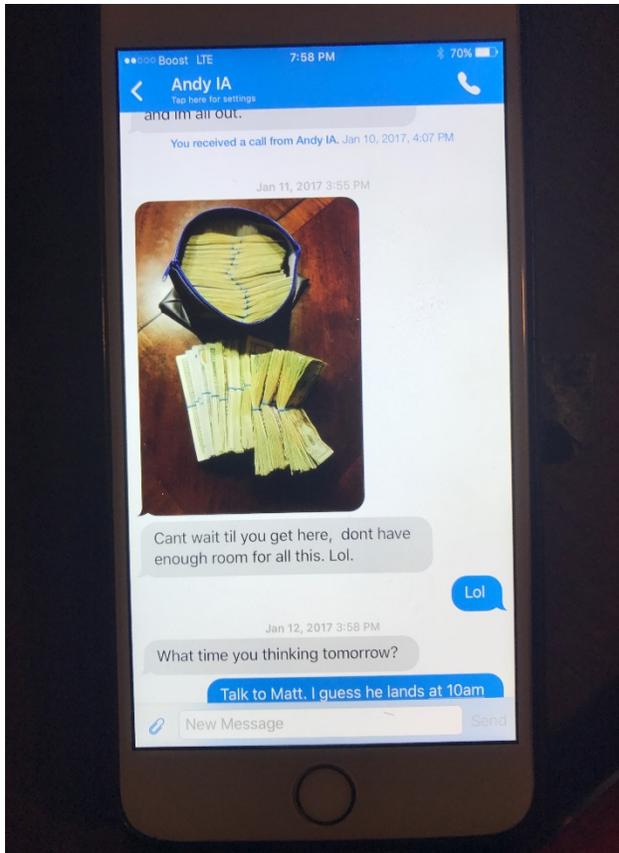


On January 2<sup>nd</sup> 2017 Andrew Baldwin and co-conspirator 2 had the following conversation via text messages:



On or between January 8<sup>th</sup> 2017 and January 26<sup>th</sup> 2017 Andrew Baldwin and co-conspirator 2 had the following conversation via text messages:

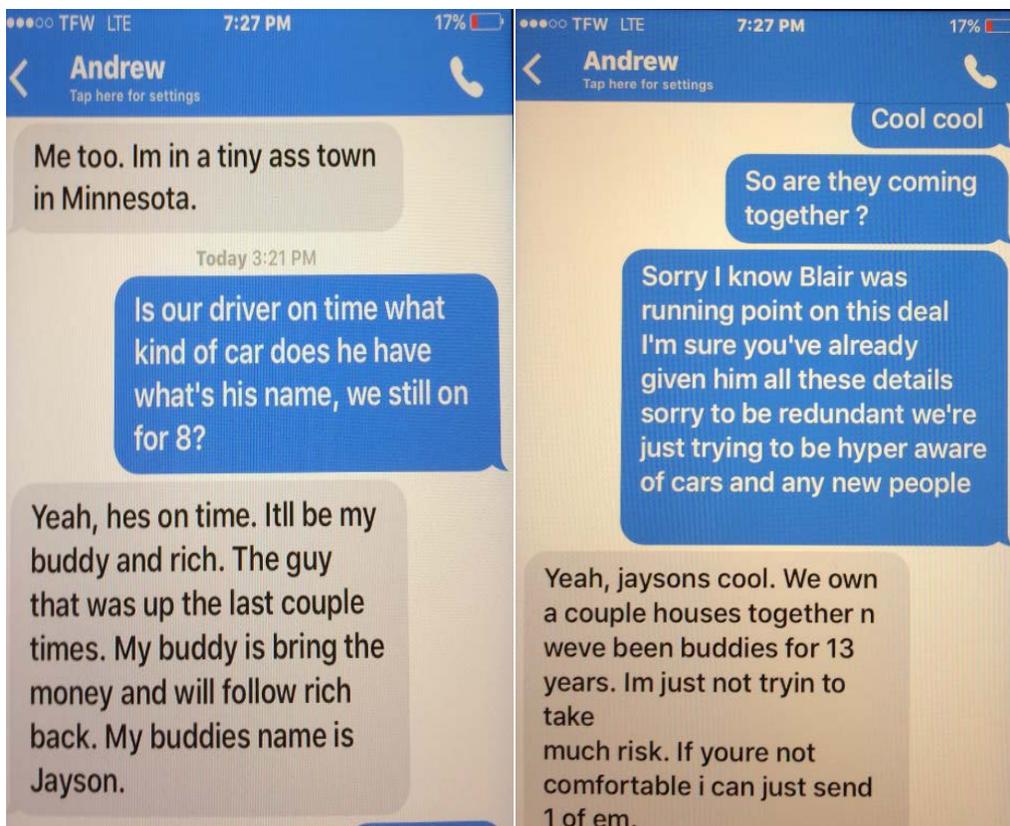




On April 6<sup>th</sup> 2017, co-conspirator 2 called Andrew Baldwin at 9:51 PM MST. In summary the following occurred:

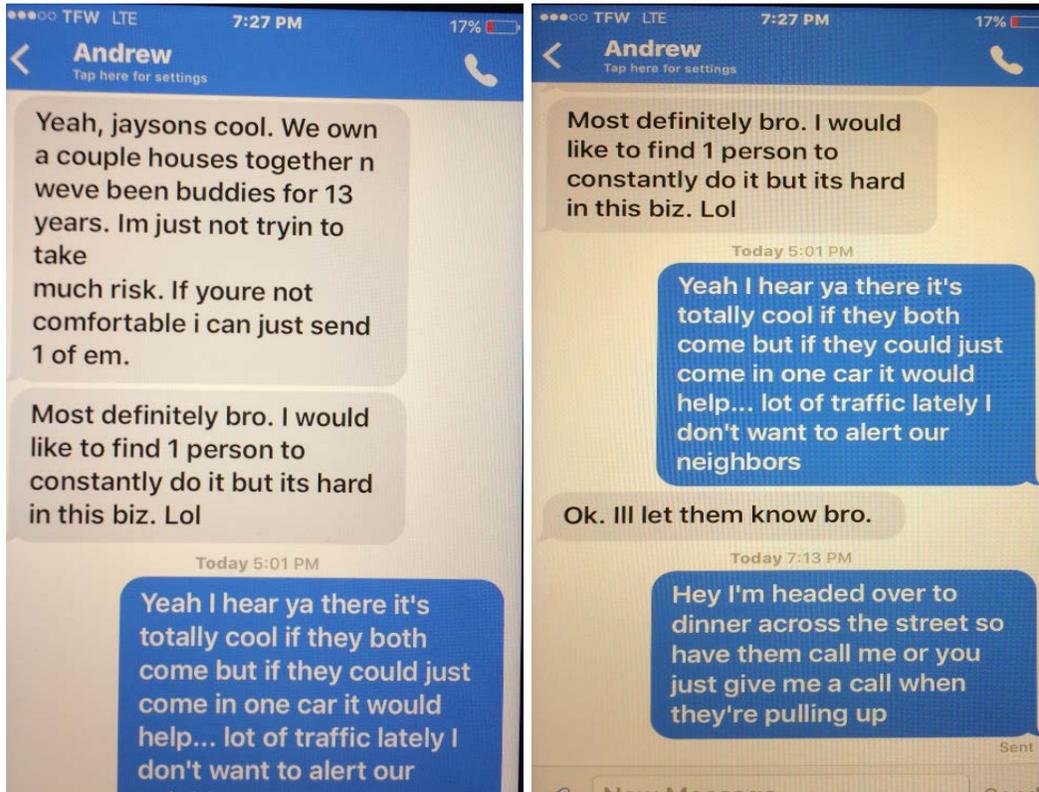
Co-conspirator 2 made a phone call to Andrew to confirm the amount of marijuana Andrew was seeking to purchase. Andrew tells Co-conspirator 2 that “they”, referring to his driver and friend should be arriving in Colorado on April 9<sup>th</sup> 2017. Andrew told the Co-conspirator 2 he had enough money to purchase 12-13 pounds. Co-conspirator 2 told Andrew that the price would be \$1950 per pound. Co-conspirator 2 and Andrew discussed Co-conspirator 2 fronting<sup>31</sup> three pounds. The deal was set for April 10<sup>th</sup> at approximately 2000 hours. This phone call was recorded and made part of the case file. The deal was set to take place at an apartment, referred to as the “trap house”<sup>32</sup>. Andrew told Co-conspirator 2 that his driver, Rich, would be traveling to pick up the marijuana. Andrew confirmed that Andrews’s friend Jayson who was going to have the money would accompany Rich. Andrew stated that Jayson would be driving separately following Rich back to Iowa.

On April 10<sup>th</sup> 2017, Andrew began communicating with co-conspirator 1 and had the following conversation via text messages:



<sup>31</sup> Fronting is a street term used meaning to allow someone to have product without any payment with the expectation they will pay for it at a later time.

<sup>32</sup> Trap house is a street term meaning a place solely used for illegal purposes such as sale and or storage of drugs.



On April 10<sup>th</sup> 2017, at 1920 hours co-conspirator 1 called Andrew to confirm Jayson and Richard would be arriving still. During the conversation, Andrew stated he would contact co-conspirator 1 when Jayson and Richard were close to arriving. Andrew told co-conspirator 1 that Jayson and Richard would be arriving in Andrew's truck.

On April 10<sup>th</sup> 2017, at 2102 hours, co-conspirator 1 received a call from Andrew. Andrew stated that Jayson and Richard had arrived at the complex and were lost. Andrew stated that Jayson and Richard had parked next to a Roto Rooter van. Jayson and Richard were subsequently contacted while in Andrew's truck, which was parked next to a Roto Rooter van.

### Gustavo Ruiz Medrano organization

The members of this enterprise that worked under the direction of Gustavo Ruiz-Medrano were identified as: Brianna Cole Williams, Reyna Brianna Portillo, Gabriel Medrano, Juan Antonio Chairez, Autry Campos-Dowd. The reader should refer to earlier in this document in order to recall how this organization from Amarillo, Texas became involved with the enterprise being investigated in Douglas County, Colorado.

In summary, Gustavo Ruiz-Medrano began purchasing large quantities of marijuana from the enterprise. Gustavo would travel to Colorado often times with his girlfriend, Reyna Portillo, and purchase the marijuana and transport it back to Amarillo, Texas. Co-conspirator 1 and co-conspirator 2 identified Gustavo as one of their most consistent purchasers of marijuana. Gus first came to Colorado he arrived with two males that he (Gus) said were his cousins. Co-conspirator identified the two males that arrived with Gus as Gabriel “Gabe” Medrano and Juan Antonio “Tony” Chairez.<sup>33</sup> Gabriel and Juan accompanied Gustavo on numerous occasions to assist in making large quantity purchase of marijuana from the enterprise. Gustavo eventually began sending another driver who he introduced to the enterprise as one of his driver’s. This driver was identified as Brianna Cole Williams. Brianna, self admittedly, described herself as a driver/transporter of marijuana for Gustavo. Brianna received the money used to purchase the large quantity of marijuana from Gustavo, and sometimes Gustavo’s girlfriend Reyna. Brianna would make the purchase, after Gustavo arranged it and transport the marijuana back to Amarillo, Texas, where Gustavo distributed and sold the marijuana. Autry Campos was also identified as a person who accompanied Gustavo to Douglas County, Colorado to purchase large quantities of marijuana from the enterprise.

Sergeant Shane Mays of the Randall County Sheriff’s Office conducted a large-scale investigation in Randall County, which incorporates Amarillo, Texas. His investigation provided corroborating information, identifying each person’s role and involvement in the Gustavo Ruiz organization. Detective Mays eventually learned that Gustavo turned his business over to another co-conspirator, identified as Robert Sanchez.

### Robert Lee Sanchez

On March 8<sup>th</sup> 2017, Robert Sanchez of Amarillo, Texas arrived at a pre-determined location in order to purchase 16 pounds of marijuana form the enterprise, specifically from co-conspirator 2. Robert and co-conspirator 2 previously discussed and arranged for the purchase through telecommunication device and Robert stated he wanted to purchase marijuana in the price range of \$1700 and \$1800 per each pound. Robert stated that he wanted to purchase 16 pounds of marijuana. On March 8<sup>th</sup> 2017, Robert arrived and parked in front of the location where he was to purchase marijuana. Robert exited the vehicle and walked to the front door and knocked on the door. While at the door, Robert was contacted by Law Enforcement officers and detained. In his possession, inside the backpack and on his

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<sup>33</sup> On March 7<sup>th</sup> 2017, Randal County Detective Shane Mays produced photo line-ups that included Chairez and Medrano. Chairez and Medrano were selected from the photo line-ups.

person, there was \$28,655.00 total in cash. Also in Robert's possession was the cell phone used to unlawfully communicate with co-conspirator 1. A search of Roberts's cell phone showed his communication with co-conspirator 1 to arrange for the purchase of marijuana unlawfully. In addition, Roberts's phone revealed a relationship with another member of the enterprise identified as Gus Ruiz. Co-conspirator 1 and co-conspirator 2 stated that Robert has made over 5 or more purchases of marijuana and has purchased over 75 pounds. Furthermore, Robert was introduced to the enterprise by Gus Ruiz, another member of the enterprise whose role will be further identified for the reader in the pages following. The number Robert used to communicate with members of the enterprise was 1-806-418-0173.

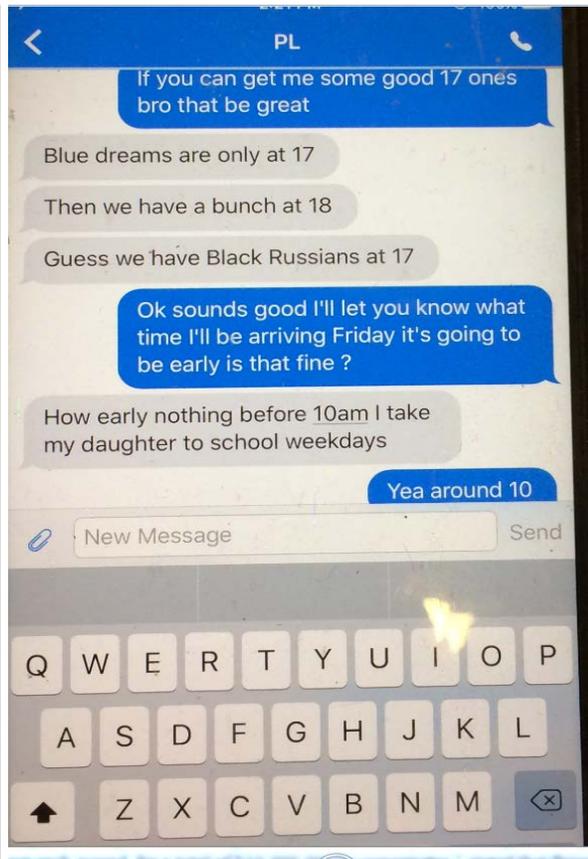
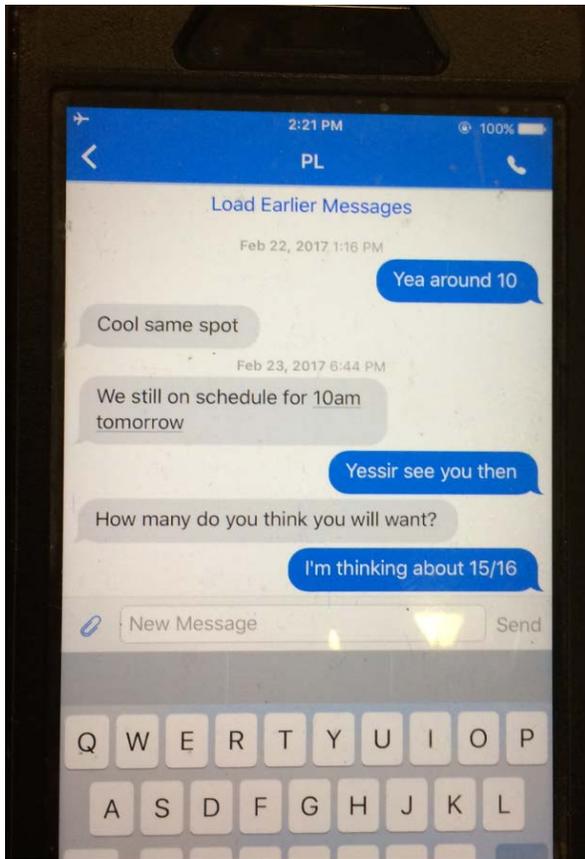
### Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered 28-38.

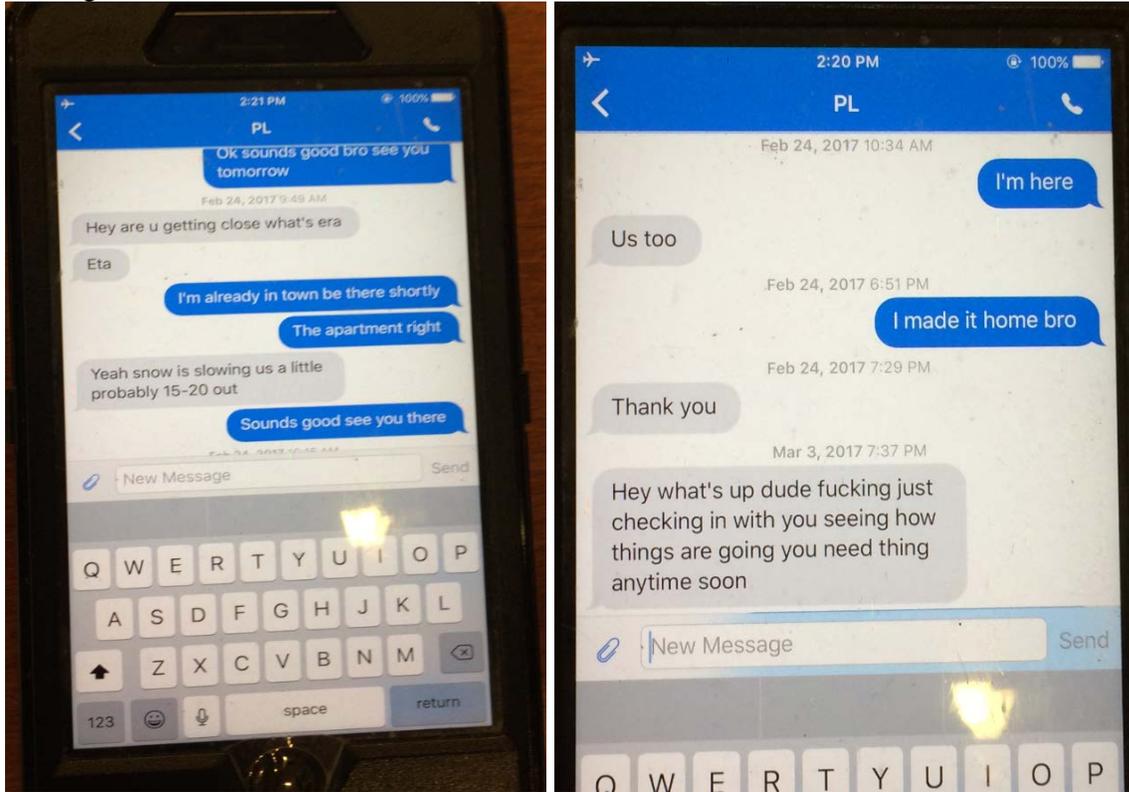
On and between February 10<sup>th</sup> 2017 and February 12<sup>th</sup> 2017, Robert and co-conspirator1 had the following conversation via text message:



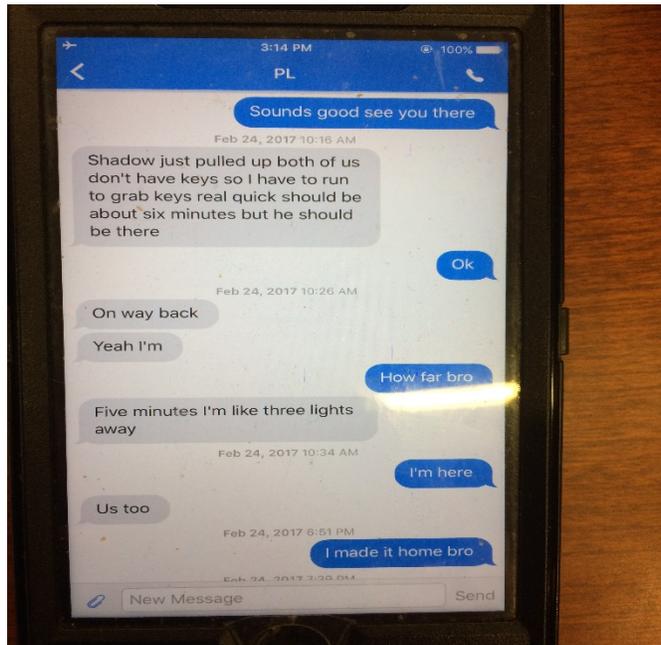
On February 22<sup>nd</sup> 2017 and February 23<sup>rd</sup> 2017, Robert and co-conspirator1 had the following conversation via text message:



On February 24<sup>th</sup>, Robert and co-conspirator1 had the following conversation via text message:

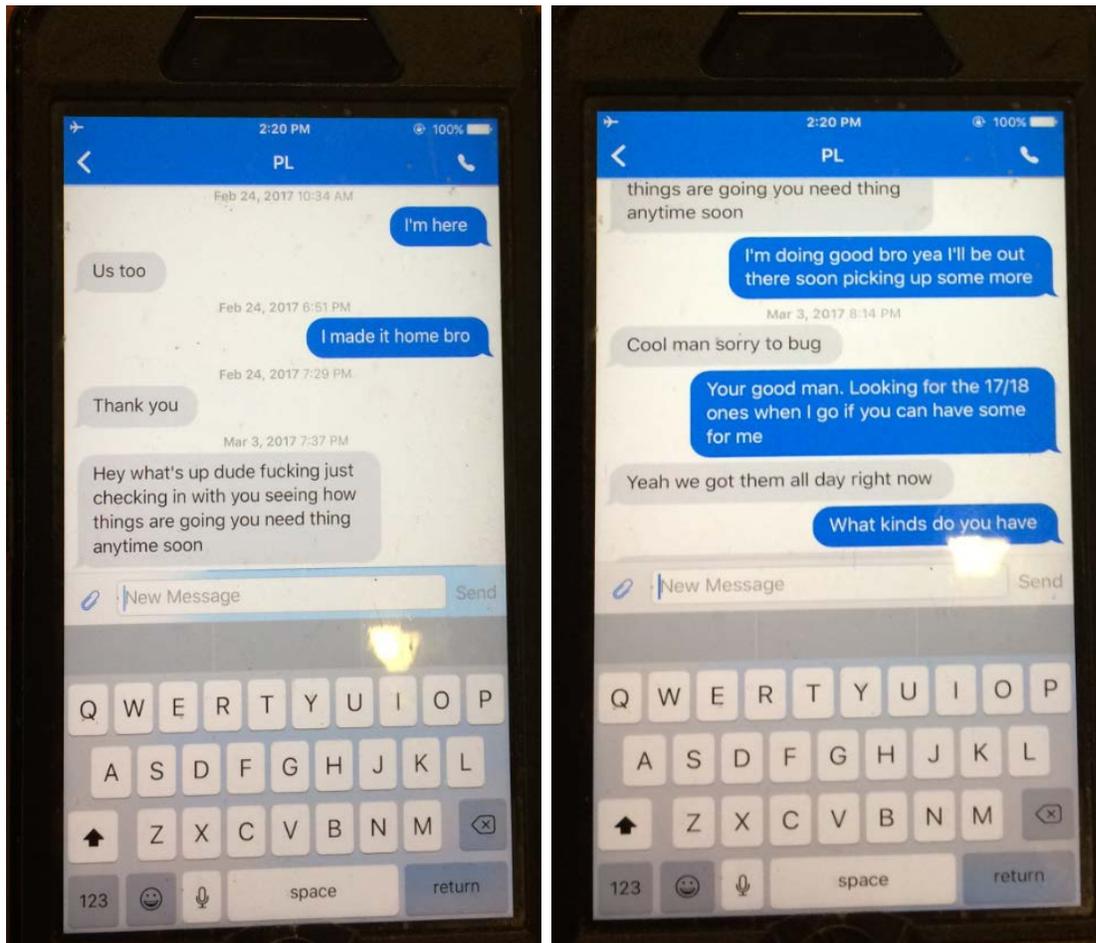


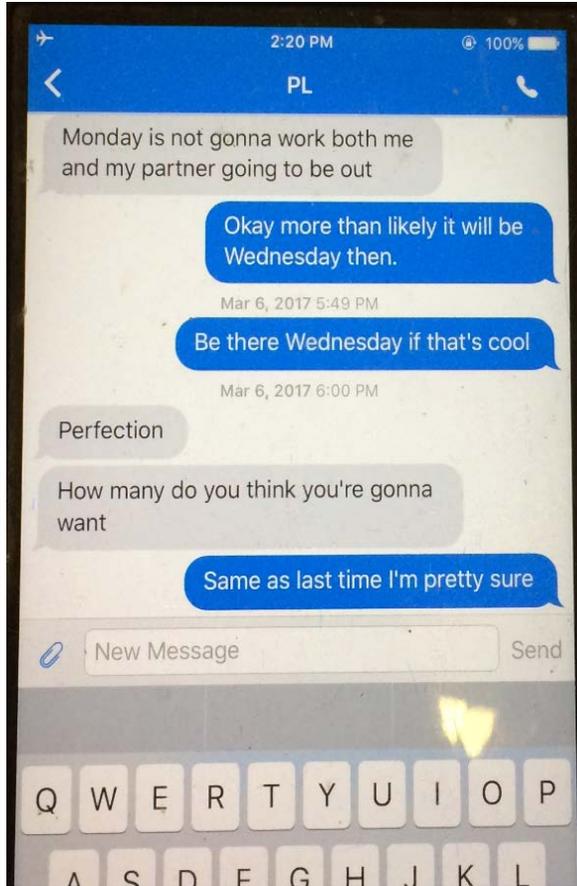
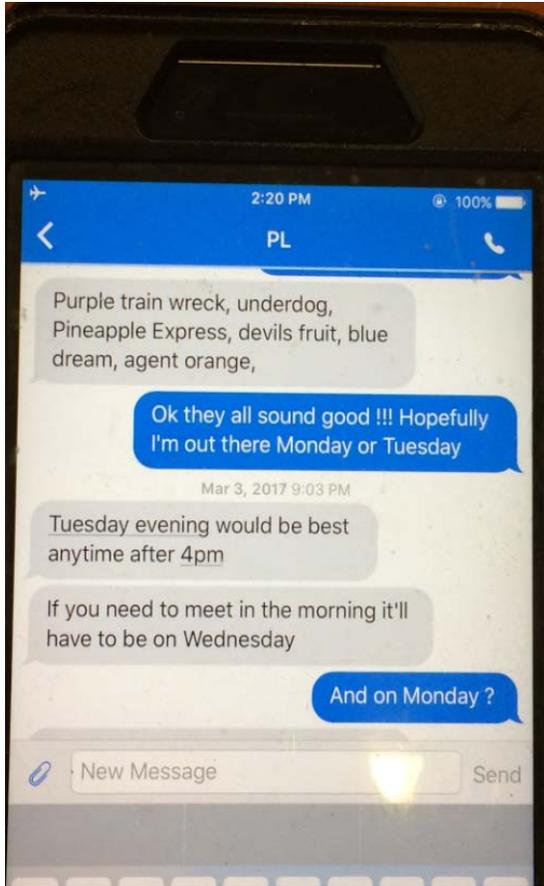
34



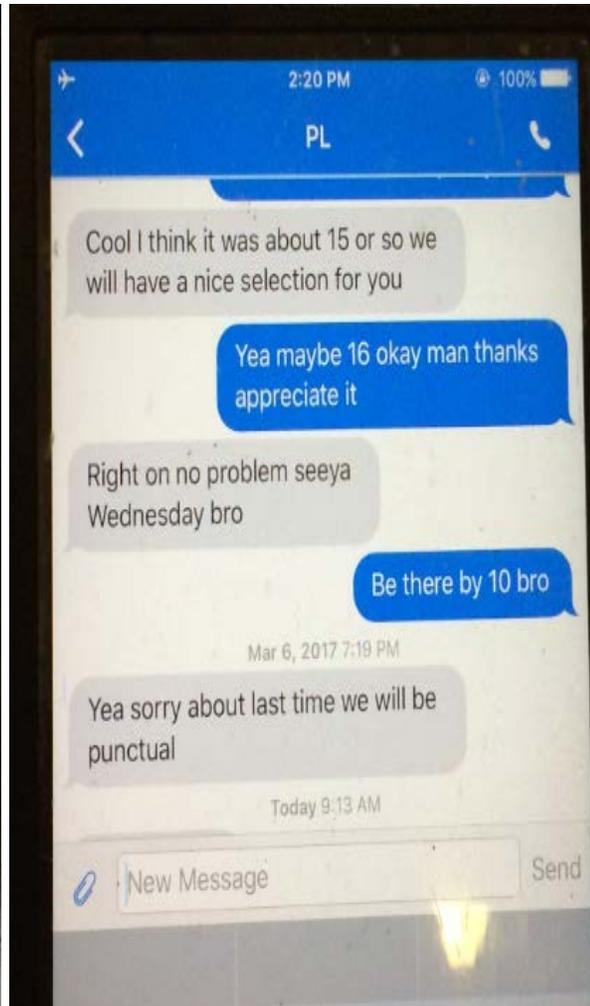
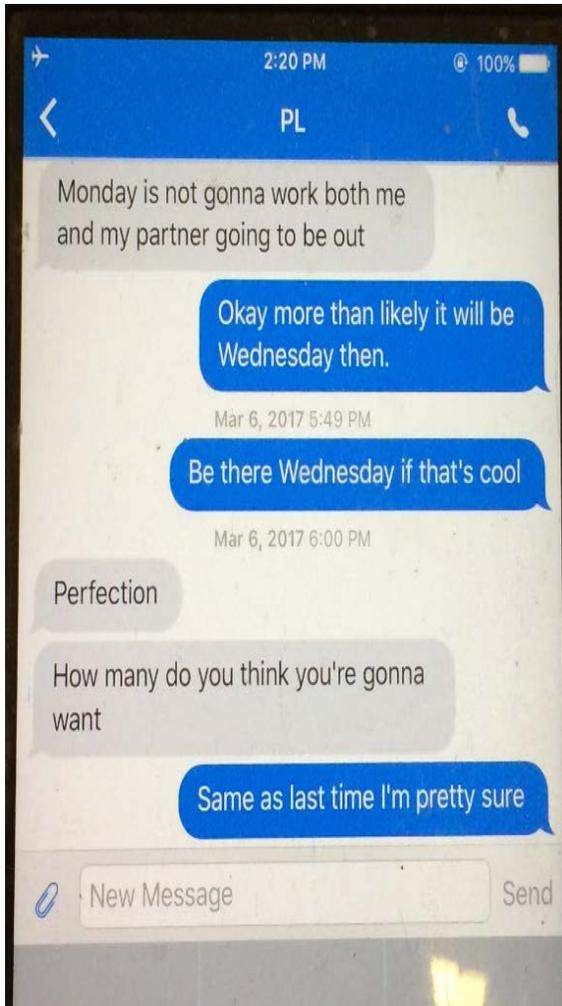
<sup>34</sup> The reader should know that listed name of "PL" in the text messages is how Robert had co-conspirator listed in his phone.

On March 3<sup>rd</sup> 2017, Robert and co-conspirator 1 had the following conversation via text message:

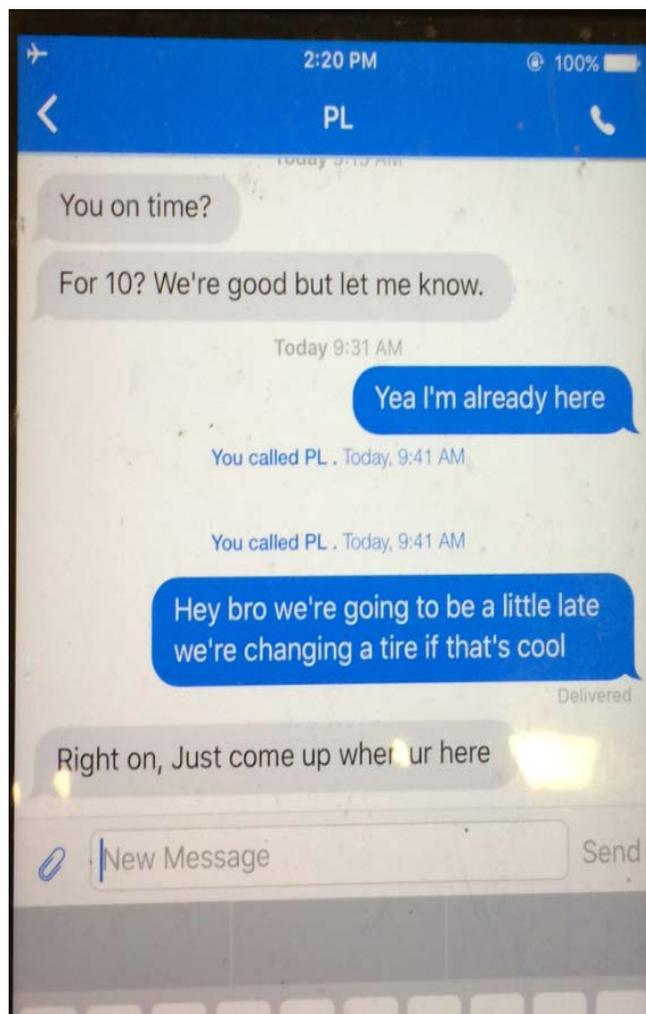




On March 6<sup>th</sup> 2017, Robert and co-conspirator 1 had the following conversation via text message:



On March 8<sup>th</sup> 2017, Robert and co-conspirator 1 had the following conversation via text message:



<sup>35</sup> The text message shows the date as "today", that date is known as March 8<sup>th</sup> 2017

Robert's deceitful story occurred when Law Enforcement Officers interviewed him on March 8<sup>th</sup> 2017. Detective Galvan and Investigator Shane Mays of Randall County Sheriff's Office in Texas conducted an interview with Robert. Robert was asked about a male identified as Gus. Robert denied knowing the male and attempted to convince officers that his relationship with Gus was nonexistent. However, in contrast to his assertions to the above named law enforcement officers, Evidence from Roberts phone, Gus Ruiz phone, and co-conspirators, clearly identified that Robert and Gus had a relationship, specifically a business relationship in dealing marijuana to residents in the State of Texas.

#### Fatmir Cosic and Jaylen Le Grand

On April 29<sup>th</sup>, 2017, Fatmir Cosic AKA "Texas Joe" and Jaylen Legrand drove from Richardson, Texas and arrived at a pre-determined location in Colorado in order to purchase 25 pounds of marijuana for \$43,125 (\$1,725 a pound) from CI 17-106. Cosic and CI 17-106 previously discussed and arranged for the purchase through telecommunication device and Cosic agreed to purchase 25 pounds of marijuana at \$1,725 per pound.

On April 29<sup>th</sup>, 2017 at about 1045 hours, Cosic texted the CI stating he was arriving. Cosic stated he was driving a blue Jeep with Oklahoma plates. Cosic arrived at the predetermined location. The blue Jeep parked in close vicinity to a Douglas County detective. Shortly after, a heavy set Hispanic male exited the driver's side. Detectives on scene were able to identify the Hispanic male as Cosic, from a previously obtained driver's license photo. Cosic went to the rear of the Jeep and opened the hatch door to the cargo area. Cosic was contacted by detectives. His identity was confirmed by his driver's license located in his wallet in the front left pants pocket.

Detectives contacted Legrand in the rear seat of the Jeep. A search of the vehicle was conducted and a large amount of US currency was located in the rear cargo area where Cosic was reaching prior to contact. Other large amounts of cash were located in the area where Legrand was sitting. Both Cosic and Legrand denied ownership of the US currency (\$43,125 total). Legrand stated he was at the location to visit his grandfather, however, he didn't know which apartment his grandfather lived in.

Cosic and Legrand were transported to the Douglas County Sheriff's Office substation for interviews. Cosic was advised of his Miranda Rights and he signed the waiver and agreed to speak to detectives. Cosic admitted to knowing why he was there (to purchase marijuana) but wouldn't admit to owning the money. Cosic stated he was asked to rent the car and to drive the rental car to Colorado. Cosic would only state that he was meeting up with "Bruce."

Cosic stated that two Samsung cell phones belonged to him. Cosic also signed a consent to search form allowing law enforcement to download the two phones so that they could be returned to him the same day. Cosic also gave consent to download a silver "sky" phone that was found on the front passenger seat. Cosic later stated that the phone wasn't his and was essentially abandoned. All downloads were preserved as evidence.

Both Cosic and Legrand were released after the interview was completed.

### Unlawful Use of Communication Facilities

The written text (including times and dates) and photographs are hereby incorporated by this reference in order to memorialize electronic communications via text, and SMS for the purposes of providing further description for the above Predicate Acts numbered.

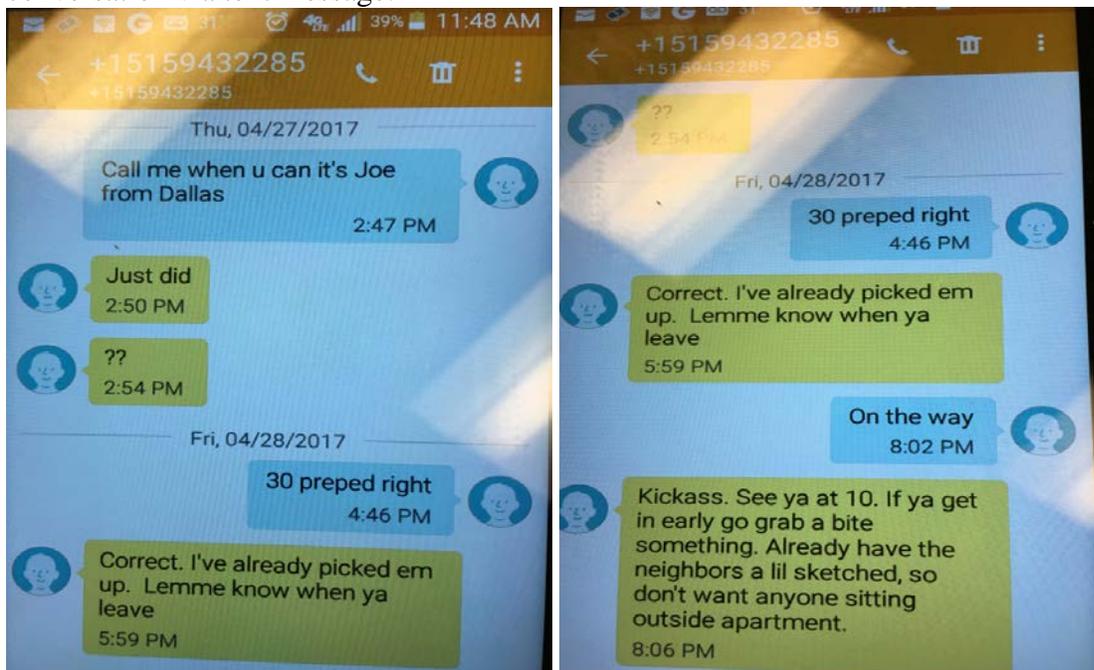
On March 29<sup>th</sup> 2017 at 6:44 PM MST co-conspirator 2 and Fatmir Cosic had a telephone conversation; The recorded conversation In summary went as follows:

“Joe” Fatmir Cosic and conconspirator 2 discussed marijuana sales, specifically prices per pound and how much he wanted to start purchasing. Cosic told co-conspirator 2 that he wanted to purchase 20 pounds of marijuana. Cosic stated that he would like to regularly purchase 40 pounds of marijuana a month. Cosic told co-conspirator 2 he would like the price per each pound of marijuana to be around \$1800.

On April 6<sup>th</sup> 2017 at 1:14 PM MST co-conspirator 2 received a call from “Joe” Cosic. The recorded conversation in summary went as follows:

Cosic and co-conspirator 2 discussed the price of 20 pounds of marijuana at \$1800 per each pound. They then spoke about Cosic receiving 5 pounds on the “front” at a price of \$2000 per pound. Co-conspirator 2 and Cosic begna discussing past business dealings with another memeber of the enterprise and the bad dealings he (Cosic) had. Co-conspirator 2 and Cosic agreed to speak again later to confirm the exact date Cosic would be arriving.

On April 27<sup>th</sup> 2017 and April 28<sup>th</sup> 2017 Cosic and co-conspirator 2 had the following conversation via text message:



## James Jones

The reader should refer to earlier pages for reference on James Jones involvement in the enterprise. As noted previously, Postal Inspector Fuller seized two packages that contained U.S currency. The investigation and information learned from co-conspirator 1, co-conspirator 2, and co-conspirator 3, was that the P.O. Box was used for the sole purposes of having U.S. currency mailed to that P.O. Box that was used to purchase marijuana destined to be mailed across various states. Co- conspirator 2 advised that James Jones was a customer whom he met on Craigslist, where an ad was posted for the sale of marijuana by the enterprise and several of its members. James Jones originally met co-conspirator 2 and other known members of the enterprise in the latter part of 2016. James identified himself to the enterprise as “Eric”. James began purchasing anywhere from 2-4 pounds a month from the enterprise. Soon after James asked co-conspirator 2 if he would be willing to mail him marijuana via US Mail to South Carolina, where he allegedly was from. Co-conspirator 2 agreed under the condition that James setup his own P.O. Box, so that co-conspirator 2 would not have to use or give his personal address to receive the money.

On May 17<sup>th</sup> 2016, James Jones, opened P.O. Box 4587, Greenwood Village, CO 80155. James agreed to provided co-conspirator 2 with the key so he could retrieve the currency that he (James Jones) was sending in exchange for marijuana being mailed. Co-conspirator 2 advised that James Jones successfully sent money on two occasions using the P.O. box he setup, and he successfully received approximately 6 or more pounds of marijuana via the mail. In addition to the two packages mailed that contained marijuana, Jones met with members of the enterprise on 8 or more occasions in person in order to illegally purchase marijuana destined to be sold in South Carolina. On each occasion James Jones would purchase anywhere from 2- 4 pounds of marijuana and sometimes would purchase marijuana concentrate in addition.

James Jones provided a number for his P.O. Box of 843-642-3690. The number was searched utilizing a Law Enforcement database, TLO, and showed the number as belonging to James Eric Jones DOB: 09/30/1977. The identification used to open the P.O. Box also identified James Jones with the same date of birth.

AS TO COUNT ONE:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT TWO:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT THREE:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT FOUR:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT FIVE:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT SIX:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT SEVEN:

**SIGNATURE REDACTED**

AS TO COUNT EIGHT:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT NINE:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT TEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT ELEVEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT TWELVE:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT THIRTEEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT FOURTEEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT FIFTEEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT SIXTEEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT SEVENTEEN:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT EIGHTEEN:

**SIGNATURE REDACTED**

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT NINETEEN:

**SIGNATURE REDACTED**

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

AS TO COUNT TWENTY:

**SIGNATURE REDACTED**

Foreperson

A NO TRUE BILL

\_\_\_\_\_  
Foreperson

**SIGNATURE REDACTED**

\_\_\_\_\_, the Foreperson of the 2017 18<sup>th</sup> Judicial Grand Jury, do hereby swear and affirm that each and every True Bill returned in this superseding indictment by the 2017 18<sup>th</sup> Judicial 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 2017 18<sup>th</sup> Judicial Grand Jury. The 2017 18<sup>th</sup> Judicial Grand Jury further authorizes and instructs the 18<sup>th</sup> Judicial District Attorney's Office to return this superseding indictment to open court with or without the presence of the foreperson.

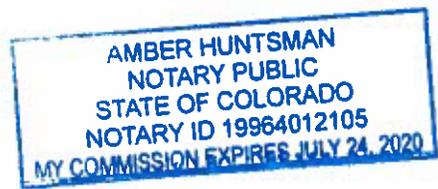
**SIGNATURE REDACTED**

Foreperson

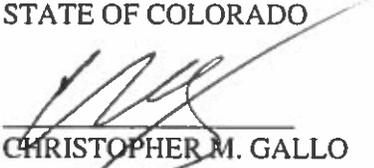
Subscribed to before me in the County of Douglas, State of Colorado, this 2<sup>nd</sup> day of November, 2017.

  
\_\_\_\_\_  
Notary Public

My commission expires: 07/24/2020



GEORGE BRAUCHLER  
18<sup>TH</sup> JUDICIAL DISTRICT ATTORNEYS OFFICE  
STATE OF COLORADO



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CHRISTOPHER M. GALLO  
Chief Deputy District Attorney  
District Attorney's Office,  
18<sup>th</sup> Judicial District

The 2017 18<sup>th</sup> Judicial Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 14<sup>th</sup> day of November, 2017.

Pursuant to §13-73-107, C.R.S., the Court designates Douglas County, Colorado as the county of venue for the purposes of trial.

Dated this 14<sup>th</sup> day of November, 2017.



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Chief Judge  
Presiding Judge, 18<sup>TH</sup> Judicial Grand Jury

**WARRANTS TO ISSUE:**

**BOND FOR** Alberto Romero, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Alexandra Romero, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Daniel Jamaal Manu, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Brian Jermaine Alexander, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants

Obey all state and federal laws

Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Miyoshi Lee Moorer, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants

Obey all state and federal laws

Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Robert Lee Sanchez, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants

Obey all state and federal laws

Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Vincent Jr. Bernette Casey, SET AT \$ 50,000 C /S/P

Conditions of bond include:

No contact with any codefendants

Obey all state and federal laws

Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Layth Mamdouh, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Ammar Niazey, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Walter Recinos Garcia, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Andrew Baldwin, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Richard Sweetman, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Jayson King, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Fatmir Cosic, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Jaylen Legrand, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Anthony James Hagman, SET AT \$ 50,000 C /S/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws

Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR Daniel Levy, SET AT \$ 50,000 C /S/ ~~P~~**

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR Gustavo Ruiz-Medrano, SET AT \$ 50,000 C /S/ ~~P~~**

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR Reyna Briana Portillo, SET AT \$ 50,000 C /S/ ~~P~~**

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR Brianna Cole Williams, SET AT \$ 50,000 C /S/ ~~P~~**

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR Gabriel Medrano, SET AT \$ 50,000 C /S/ ~~P~~**

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Juan Antonio Chairez, SET AT \$ 50,000 C /SI/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** Autry Madison Campos-Dowd, SET AT \$ 50,000 C /SI/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

**BOND FOR** James Jones, SET AT \$ 50,000 C /SI/ ~~P~~

Conditions of bond include:

No contact with any codefendants  
Obey all state and federal laws  
Turn in passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

Dated this 14<sup>th</sup> day of November, 2017.



Chief Judge  
Presiding Judge, 18<sup>th</sup> Judicial Grand Jury