

COUNT SEVEN	Second Degree Burglary, §18-4-203, C.R.S. (F3) 06032
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COUNT TWENTY-SIX	Theft- \$750-\$2,000, §18-4-401(1), (2)(E); (M1) 08A12

COUNT TWENTY-SEVEN	Second Degree Burglary, §18-4-203, C.R.S. (F3) 06032
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YENNY ZORAYA RODAS FLOREZ, a/k/a Yenny Rodas Florez	1-34, 40-46

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO	
1437 Bannock Street Denver, CO 80202	
THE PEOPLE OF THE STATE OF COLORADO,	
v.	
SANTIAGO HOYOS GAVIRIA, a/k/a Santiago Hoyos	
JHON EDER FLOREZ MOLINA, a/k/a Jhon Molina	
and	
YENNY ZORAYA RODAS FLOREZ, a/k/a Yenny Florez	
Defendants.	
PHILIP J. WEISER, Attorney General ROBERT S. SHAPIRO, First Assistant Attorney General, Registration Number: 26869 1300 Broadway, 9 th Floor Denver, CO 80203	▲ COURT USE ONLY ▲ Grand Jury Case No.: 2019CR0001 Ctrm: 259 Case Number:
COLORADO STATEWIDE GRAND JURY INDICTMENT	

Of the 2019-2020 term of the Denver District Court in the year 2019; the 2019-2020 Colorado Statewide 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) 37284
COUNT TWO	COCCA-Conspiracy, §18-17-104(4), C.R.S. (F2) 37285
COUNT THREE	Second Degree Burglary, §18-4-203, C.R.S. (F3) 06032
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COUNT FORTY-SIX

Theft - \$100,000-\$1,000,000, §18-4-401(1), (2)(I), C.R.S.
(F3) **08A16**

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COUNT ONE

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT -
PATTERN OF RACKETEERING - PARTICIPATION IN AN
ENTERPRISE, C.R.S. §18-17-104(3) (F2)**

On or about January 28, 2019 through July 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Jhon Eder Florez Molina, and Yenny Zoraya Rodas Florez**, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of section 18-17-104(3), C.R.S.

COUNT TWO

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL
ACT- CONSPIRACY, C.R.S. §18-17-104(4) (F2)**

On or about January 28, 2019 through July 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Jhon Eder Florez Molina, Yenny Zoraya Rodas Florez**, and/or others to the Grand Jury and the Attorney General known or unknown, did unlawfully, knowingly, and feloniously conspire and/or endeavored to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner and the following serves as a summary of the essential facts:

The Enterprise

The Enterprise alleged in Counts One and Two is primarily a group of individuals, associated in fact, although not a legal entity. More specifically the enterprise includes, but is not limited to, the following associated in fact individuals:

**Santiago Hoyos Gaviria,
Jhon Eder Florez Molina,
Yenny Zoraya Rodas Florez,**

and other persons or entities known or unknown to the Grand Jury and the Attorney General.

The above listed members of the Enterprise were primarily associated in fact as individuals who collaborated with each other and/or one or more of the others as principals and/or as complicitors to operate a common illicit scheme for a period of time. In particular this associated in fact Enterprise repeatedly used a common plan to commit residential burglaries and theft. The fundamental common scheme operated with the enterprise members targeting the personal residences of small business owners, all of whom were of asian ancestry. The small businesses were primarily restaurants, but also did include other livelihoods, such as a nail salon. Based on members of the enterprise conducting prior online research of the businesses along with them conducting surveillance, the enterprise apparently learned of the home addressess of the business owners and eventually learned the movement patterns of the targeted homeowners and business owners. As a result of this intelligence gathering one of more members of the enterprise would then conduct a daytime or early evening burglary of the residences while it was believed that the occupants were away at work. Law enforcement investigators observed that the typical burglary included a forced entry through a door or window. Furthermore, evidence was developed showing that the forced entry was often preceeded by persistent knocking on the door or bell ringing.

Throughout the course of the investigation, the Grand Jury and law enforcement has developed evidence to show that the Enterprise and its members were mobile travellers based in South Florida, whose activities brought them to the State of Colorado and into Southern Wyoming. During the relevant time periods in question, the identified members of the enterprise would travel from South Florida, often by plane, into Denver International Airport (DIA) followed by them renting vehicles (usually SUVs) to travel throughout Colorado and into Southern Wyoming. Within the State of Colorado evidence shows that the Enterprise and its members operated in at least the following judicial districts: 1st, 2nd, 4th, 5th, 8th, 9th, 13th, 18th, 19th, 20th and 21st. Approximately 20 percent of the provable incidents occurred in Larimer County, CO with the Fort Collins Police Services taking the lead to investigate the multi-jurisdictional allegations.

Pattern of Racketeering Activity

Santiago Hoyos Gaviria, Jhon Eder Florez Molina, and Yenny Zoraya Rodas Florez along with 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, including any lesser offenses, 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:

Second Degree Burglary, C.R.S. §18-4-203
Theft, C.R.S. §18-4-401
Burglary, W.S. §6-3-301
Theft, W.S. §6-3-402

Pursuant to C.R.S. § 18-17-103(5)(b), “Racketeering Activity” means, and also includes, any violation of the enumerated Colorado statutes at issue or any criminal act committed in any jurisdiction of the United States which, if committed in the State of Colorado, would be a crime pursuant to an enumerated Colorado statute. In this matter, in addition to the specific violations of enumerated Colorado statutes, Predicate Acts A, B, C and D are criminal acts which occurred in the State of Wyoming. If these offenses had occurred in the State of Colorado, Predicate Acts A, B, C and D would be also crimes under an enumerated Colorado statute for charging purposes and as predicate acts under the Colorado Organized Crime Control Act. Furthermore, Predicate Acts A, B, C and D are related to the ongoing behavior of this Enterprise during the charged time period.

Racketeering Activity

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following: Predicate Acts A through D and substantive Counts Three through Forty-Six, including any lesser included offenses:

PREDICATE ACT A

BURGLARY, W.S § 6-3-301(a)

On or about April 10, 2019, in Cheyenne, Laramie County, State of Wyoming, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** did, unlawfully and without authority, entered or remained in a building, occupied structure or vehicle, or separately secured or occupied portion therein, namely: the dwelling of Hua Fang Chen, located at 3305 Douglas Street, Cheyenne, WY, with the intent to commit theft or a felony therein; in violation of W.S. § 6-3-301(a).

PREDICATE ACT B

THEFT, W.S § 6-3-402(a)

On or about April 10, 2019, in Cheyenne, Laramie County, State of Wyoming, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** did, unlawfully and knowingly took or exercised unauthorized control over or made an unauthorized transfer of an interest in property of another person, namely: the personal property (including cash and jewelry) of Hua Fang Chen, with the purpose of depriving Hua Fang Chen of the property; in violation of W.S. § 6-3-402(a).

PREDICATE ACT C

BURGLARY, W.S § 6-3-301(a)

On or about April 10, 2019, in Cheyenne, Laramie County, State of Wyoming, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** did, unlawfully and without authority, entered or remained in a building, occupied structure or vehicle, or separately secured or occupied portion therein, namely: the dwelling of Tule Hoang, located at 1512 S. Trailway Rd., Cheyenne, WY, with the intent to commit theft or a felony therein; in violation of W.S. § 6-3-301(a)

PREDICATE ACT D

THEFT, W.S § 6-3-402(a)

On or about April 10, 2019, in Cheyenne, Laramie County, State of Wyoming, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** did, unlawfully and knowingly took or exercised unauthorized control over or made an unauthorized transfer of an interest in property of another person, namely: the personal property (including cash and jewelry) of Tule Hoang, with the purpose of depriving Tule Hoang of the property; in violation of W.S. § 6-3-402(a).

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Predicate Acts A, B, C and D** were committed in the following manner and serve as the non-exclusive, essential facts:

On or about April 10, 2019 the above named individuals had already been in Colorado for a few days when they ventured into southern Wyoming. While in Cheyenne, Laramie County, Wyoming on April 10, 2019, at approximately 9:00 a.m. a home, located at 3305 Douglas Street in Cheyenne and occupied by Hua Fang Chen, was burglarized with personal property, aggregated and valued at \$44,850.00, being stolen.

Then at approximately 10:20 a.m. a home, located at 1512 S. Trailway Rd in Cheyenne and occupied by Tule Hoang, was burglarized with personal property, aggregated and valued at \$15,000.00, being stolen. It should be noted that the occupants of both homes operated separate restaurants in Cheyenne, Wyoming. Law enforcement officials were able to identify the named defendants for these two residential burglaries through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise. The alleged thefts in Predicate Acts B and D are felony offenses under Wyoming state statute if the value of the property at issue is one thousand (\$1,000.00) dollars or more.

COUNT THREE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about January 29, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoaya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Aichan Yan, Yu Fenge, Weihai Chen and/or Mansha Zhao, located at 203 N. 49th Ave. Ct., Greeley, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FOUR

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about January 29, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property, of Aichan Yan, Yu Fenge, Weihai Chen and/or Mansha Zhao, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Aichan Yan, Yu Fenge, Weihai Chen and/or Mansha Zhao, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Aichan Yan, Yu Fenge, Weihai Chen and/or Mansha Zhao, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT FIVE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about January 29, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Juo Liang, located at 1733 67th Ave., Greeley, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT SIX

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5)

On or about January 29, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property, of Juo Liang, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Juo Liang, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Juo Liang, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Three through Six** were committed in the following manner and serve as the non-exclusive, essential facts:

On January 29, 2019 the above named individuals in Counts Three through Six were in Greeley, Weld County, CO when at approximately 10:00-10:30 a.m. two homes were burglarized with personal property being stolen. While in Greeley on January 29 2019, during this 10:00 a.m. time period one home, located at 203 N. 49th Ave. Ct and resided in by Aichan Yan, Yu Fenge, Weihai Chen and/or Mansha Zhao, was burglarized with personal property, aggregated and valued at \$32,800.00, being stolen. Then, in close proximity in terms of time, a second home, located at 1733 67th Ave. and occupied by Juo Liang, was burglarized with personal property, aggregated and approximately valued at \$5,500.00, being stolen. It should be noted that the occupants of both homes operated separate restaurants in Greeley. Law enforcement officials were able to identify the named defendants for these two residential burglaries through a variety of sources,

including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise.

COUNT SEVEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about January 30, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Loretta Leung, Aaron Lew, Lauren Lew and/or Wai Yip Lew, located at 3763 Cosmos Ln. Fort Collins, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT EIGHT

THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) (F6)

On or about January 30, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Loretta Leung, Aaron Lew, Lauren Lew and/or Wai Yip Lew, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to safes, a firearm, cash and jewelry) of Loretta Leung, Aaron Lew, Lauren Lew and/or Wai Yip Lew with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive Loretta Leung, Aaron Lew, Lauren Lew and/or Wai Yip Lew, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT NINE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about January 30, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Li Zhu and/or Jin Yuan Yang, located at 2974 William Neal Parkway, Fort Collins, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about January 30, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Li Zhu and/or Jin Yuan Yang, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash jewelry and electronics) of Li Zhu and/or Jin Yuan Yang with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Li Zhu and/or Jin Yuan Yang, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Seven through Ten** were committed in the following manner and serve as the non-exclusive, essential facts:

On January 30, 2019 the above named individuals in Counts Seven through Ten were in Fort Collins, Larimer County, CO when at approximately 12:27-1:14 p.m. two homes were burglarized with personal property being stolen. While in Fort Collins on January 30 2019, during the above referenced time period one home, located at 3763 Cosmos Ln and resided in by Loretta Leung, Aaron Lew, Lauren Lew and/or Wai Yip Lew was burglarized with personal property, aggregated and valued at approximately \$2,575.00, being stolen. Then, in close proximity in terms of time, a second home, located at 2974 William Neal Parkway and occupied by Li Zhu and/or Jin Yuan Yang, was burglarized with personal property, aggregated and valued of at least \$20,000.00, being stolen. It should be noted that the occupants of both homes operated separate restaurants in Fort Collins. Law enforcement officials were able to identify the named defendants for these two residential burglaries through a variety of sources, including, but not limited to a review of Google records, video and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT ELEVEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about February 4, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Kelly Yang, Va Tac Ha, Steven Ha, Anthony Ha, Ya Ying Ha, and/or Joe Ha, located at 18414 Acoma Ave., Fort Morgan, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWELVE

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about February 4, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property, of Kelly Yang, Va Tac Ha, Steven Ha, Anthony Ha, Ya Ying Ha, and/or Joe Ha, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Kelly Yang, Va Tac Ha, Steven Ha, Anthony Ha, Ya Ying Ha, and/or Joe Ha, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Kelly Yang, Va Tac Ha, Steven Ha, Anthony Ha, Ya Ying Ha, and/or Joe Ha, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Eleven and Twelve** were committed in the following manner and serve as the non-exclusive, essential facts:

On February 4, 2019 the above named individuals in Counts Eleven and Twelve were in Fort Morgan, Morgan County, CO when during and between approximately 9:45 a.m. and 1 p.m. a home was burglarized with personal property being stolen. The home, located at 18414 Acoma Ave. and resided in by Kelly Yang, Va Tac Ha, Steven Ha, Anthony Ha, Ya Ying Ha, and/or Joe Ha was burglarized with personal property, aggregated and approximately valued of at least \$45,000.00, being stolen. It should be noted that the occupants of the home operated a restaurant in Fort Morgan. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT THIRTEEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about February 8, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Yi Lui, Jiahai Cui, and/or Sanmei Zhang located at 630 S. Surrey Ct., Grand Junction, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FOURTEEN

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5)

On or about February 8, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property, of Yi Lui, Jiahai Cui, and/or Sanmei Zhang, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Yi Lui, Jiahai Cui, and/or Sanmei Zhang, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Yi Lui, Jiahai Cui, and/or Sanmei Zhang, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Thirteen and Fourteen** were committed in the following manner and serve as the non-exclusive, essential facts:

On February 8, 2019 the above named individuals in Counts Thirteen and Fourteen were in Mesa County, CO when a home was burglarized with personal property being stolen. The home, located at 630 S. Surrey Ct. and resided in by Yi Lui, Jiahai Cui, and/or Sanmei Zhang, was burglarized with personal property, aggregated and valued at approximately \$10,000.00, being stolen. It should be noted that the occupants of the home operated a small business in Grand Junction. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise.

COUNT FIFTEEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about February 13, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Jacky Lenh, Vivian Lenh and/or Benjamin Lenh, located at 1168 Night Blue, Cr., Monument, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT SIXTEEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about February 13, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Jacky Lenh, Vivian Lenh and/or Benjamin Lenh, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Jacky Lenh, Vivian Lenh and/or Benjamin Lenh, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Jacky Lenh, Vivian Lenh and/or Benjamin Lenh permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Fifteen and Sixteen** were committed in the following manner and serve as the non-exclusive, essential facts:

On February 13, 2019 the above named individuals in Counts Fifteen and Sixteen were in Monument, El Paso County, CO when a home was burglarized with personal property being stolen. The home, located at 1168 Night Blue Cr. and resided in by Jacky Lenh, Vivian Lenh and/or Benjamin Lenh was burglarized with personal property, aggregated and valued at \$50,000.00, being stolen. It should be noted that the occupants of the home operated a small business in El Paso County. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT SEVENTEEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 6, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Qin Li, Zengiu Liu and/or Zengli Liu, located at 3488 Ghost Dance Dr, Castle Rock CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT EIGHTEEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about April 6, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Qin Li, Zengiu Liu and/or Zengli Liu, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash, jewelry and a safe) of Qin Li, Zengiu Liu and/or Zengli Liu, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Qin Li, Zengiu Liu and/or Zengli Liu permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT NINETEEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 8, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Zhong Chen, Jun Li, Michelle Chen, Yan Liu, Xueping Li, Yu Hui Gao and/or Mandy Chen, located at 2187 Paint Pony Cir., Castle Rock CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWENTY

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about April 8, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Zhong Chen, Jun Li, Michelle Chen, Yan Liu, Xueping Li, Yu Hui Gao and/or Mandy Chen without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash, jewelry, purses and handbags) of Zhong Chen, Jun Li, Michelle Chen, Yan Liu, Xueping Li, Yu Hui Gao and/or Mandy Chen, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Zhong Chen, Jun Li, Michelle Chen, Yan Liu, Xueping Li, Yu Hui Gao and/or Mandy Chen permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Seventeen through Twenty** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 6 and 8, 2019 the above named individuals in Counts Seventeen through Twenty were in Castle Rock, Douglas County, CO when two homes were burglarized with personal property being stolen. The first home, located at 3488 Ghost Dance Dr. and resided in by Qin Li, Zengiu Liu and/or Zengli Liu, was burglarized on April 6, 2019 with personal property, aggregated and valued at approximately \$38,000.00, being stolen. The second home, located at 2187 Paint Pony Cir. and resided in by Zhong Chen, Jun Li, Michelle Chen, Yan Liu, Xueping, Li, Yu Hui Gao and/or Mandy Chen was burglarized on April 8, 2019 with personal property, aggregated and valued at approximately \$73,000.00, being stolen. It should be noted that the occupants of the homes operated separate restaurants in Douglas County. Law enforcement officials were able to identify the named defendants for these residential burglaries through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT TWENTY-ONE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 11, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Jin Loong Wu, Dao Gang Wu, Dao Dong Wu and/or Chen Lee Wu, located at 4525 Swansboro Ct., Highlands Ranch, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWENTY-TWO

THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) (F6)

On or about April 11, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Jin Loong Wu, Dao Gang Wu, Dao Dong Wu and/or Chen Lee Wu,, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash, jewelry and a safe) of Jin Loong Wu, Dao Gang Wu, Dao Dong Wu and/or Chen Lee Wu, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive Jin Loong Wu, Dao Gang Wu, Dao Dong Wu and/or Chen Lee Wu,, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Twenty-One and Twenty-Two** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 11, 2019 the above named individuals in Counts Twenty-One and Twenty-Two were in Highlands Ranch, Douglas County, CO when a home was burglarized with personal property being stolen. The home, located at 4525 Swansboro Ct. and resided in by Jin Loong Wu, Dao Gang Wu, Dao Dong Wu and/or Chen Lee Wu was burglarized on that day with personal property, aggregated and valued at approximately \$3,710.00, being stolen. It should be noted that the occupants of the home operated a restaurant in Denver metropolitan area. Law enforcement officials were able to identify the named defendants for these residential burglaries through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT TWENTY-THREE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 12, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Nhut Nguyen, Thanh Nguyen, Khoa Nguyen and/or Hoalinh Nham, located at 1814 Golden Willow Ct, Fort Collins, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWENTY-FOUR

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about April 12, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Nhut Nguyen, Thanh Nguyen, Khoa Nguyen and/or Hoalinh Nham without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on or disposed of, a thing of value, namely: personal property (including, but not limited to cash, jewelry and a purse) of Nhut Nguyen, Thanh Nguyen, Khoa Nguyen and/or Hoalinh Nham with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Nhut Nguyen, Thanh Nguyen, Khoa Nguyen and/or Hoalinh Nham, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT TWENTY-FIVE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 15, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Tony Huan, Wen Yuan and/or Pei Feng Yuan, located at 1508 Westfield Dr, Fort Collins, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWENTY-SIX

THEFT - \$750 - \$2,000, C.R.S. 18-4-401(1), (2)(e) (M1)

On or about April 15, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Tony Huan, Wen Yuan and/or Pei Feng Yuan, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash) of Tony Huan, Wen Yuan and/or Pei Feng Yuan, with the value of seven hundred and fifty dollars or more, but less than two thousand dollars, and intended to deprive Tony Huan, Wen Yuan and/or Pei Feng Yuan, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(e), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Twenty-Three through Twenty-Six** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 12 and April 15, 2019 the above named individuals in Counts Twenty-Three through Twenty-Six were in Fort Collins, Larimer County, CO when two homes were burglarized with personal property being stolen. While in Fort Collins on April 12, 2019, one home, located at 1814 Golden Willow Ct. and resided in by Nhut Nguyen, Thanh Nguyen, Khoa Nguyen and/or Hoalinh Nham, was burglarized with personal property, aggregated and valued at \$29,200.00, being stolen. Then on April 15, 2019, a second home, located at 1508 Westfield Dr. and occupied by Tony Huan, Wen Yuan and/or Pei Feng Yuan, was burglarized with personal property, aggregated and valued at \$1,000.00 being stolen. It should be noted that the occupants of both homes operated separate small businesses in Fort Collins. Law enforcement officials were able to identify the named defendants for these two residential burglaries through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT TWENTY-SEVEN

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Edward and Wendy Chow, located at 6684 Clovis Ct, Timnath, CO with the intent to commit therein the crime of Theft and/or Criminal Mischief; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT TWENTY-EIGHT

CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4-501(1),(4)(D) (F6)

On or about April 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of remained unlawfully after a lawful or unlawful entry in the dwelling of Edward and Wendy Chow, the aggregate damage being one thousand dollars or more but less than five thousand dollars; in violation of section 18-4-501(1),(4)(d), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Twenty-Seven and Twenty-Eight** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 19, 2019 the above named individuals in Counts Twenty-Seven and Twenty-Eight were in Timnath, Larimer County, CO when a home was burglarized with real and/or personal property being damaged. While in Timnath on April 19, 2019, the home, located at 6684 Clovis Ct. and resided in by Edward and Wendy Chow was

burglarized with property, aggregated and valued at \$3,000.00 being damaged. It should be noted that the occupants of the home operated a restaurant in Fort Collins. Law enforcement officials were able to identify the named defendants for these two residential burglaries through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT TWENTY-NINE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 22, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Anita Gurung, Yubraj Gurung, Sunit Gurung, Hom Gurung, Keshi Gurung, Nabin Gurung, Nabina Gurung, and/or Parkess Gurung, located at 880 Elk Rest Rd., Evergreen, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTY

THEFT - \$100,000 - \$1,000,000, C.R.S. 18-4-401(1),(2)(I) (F3)

On or about April 22, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Anita Gurung, Yubraj Gurung, Sunit Gurung, Hom Gurung, Keshi Gurung, Nabin Gurung, Nabina Gurung, and/or Parkess Gurung without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but limited to cash, jewelry, a safe and purses) of Anita Gurung, Yubraj Gurung, Sunit Gurung, Hom Gurung, Keshi Gurung, Nabin Gurung, Nabina Gurung, and/or Parkess Gurung with the value of one hundred thousand dollars or more but less than one million thousand dollars, and intended to deprive Anita Gurung, Yubraj Gurung, Sunit Gurung, Hom Gurung, Keshi Gurung, Nabin Gurung, Nabina Gurung, and/or Parkess Gurung, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(i), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Twenty-Nine and Thirty** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 22, 2019 the above named individuals in Counts Twenty-Nine and Thirty were in Evergreen, Jefferson County, CO when a home was burglarized with real and/or personal property being stolen. While in Evergreen on April 22, 2019, the home,

located at 880 Elk Rest Rd.. and resided in by Anita Gurung, Yubraj Gurung, Sunit Gurung, Hom Gurung, Keshi Gurung, Nabin Gurung, Nabina Gurung, and/or Parkess Gurung was burglarized with property (cash, jewelry, and personal identifying information), aggregated and valued at \$400,000.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Evergreen. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Google records and Call Detail Records (CDR) associated with one or more members of the enterprise

COUNT THIRTY-ONE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 22, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Zhuang Xing and/or Hao Huang, located at 2987 Deer Creek Trail., Highlands Ranch, CO with the intent to commit therein the crime of Theft and/or Criminal Mischief; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTY-TWO

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 23, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Xiaohong Huang and/or Qingwen Zeng, located at 14882 E. Maplewood Pl., Centennial, CO with the intent to commit therein the crime of Theft and/or Criminal Mischief; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTY-THREE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about April 23, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Mi Yoon and/or Sung Jeung, located at 11092 S. Hayloft St., Parker, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S

COUNT THIRTY-FOUR

THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) (F6)

On or about April 23, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Mi Yoon and/or Sung Jeung, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Mi Yoon and/or Sung Jeung, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive Mi Yoon and/or Sung Jeung, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Thirty-One through Thirty-Four** were committed in the following manner and serve as the non-exclusive, essential facts:

On April 22, 2019 the above named individuals in Count Thirty-One were also in Highlands Ranch, Douglas County, CO when a home was burglarized with real and/or personal property being stolen. This burglary occurred earlier in the day before the named individuals went to Highlands Ranch to commit the burglary and theft that was cited above. While in Highlands Ranch on April 22, 2019, the home, located at 2987 Deer Creek Trail and resided in by Zhuang Xing and Hao Huang was burglarized with property, aggregated and valued at less than \$750.00 being stolen. It should be noted that the occupants of the home worked at a restaurant in the Littleton area.

On April 23, 2019 in the early afternoon the above named individuals in Count Thirty-Two were also in Centennial, Arapahoe County, CO when a home was burglarized with real and/or personal property being stolen. While in Centennial on April 23, 2019, the home, located at 14882 E. Maplewood Pl. and resided in by Xiaohong Huang and Qingwen Zeng was burglarized. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Video and Call Detail Records (CDR) associated with one or more members of the enterprise.

On April 23, 2019 in the morning the above named individuals in Counts Thirty-Three and Thirty-Four were also in Parker, Douglas County, CO when a home was burglarized with real and/or personal property being stolen. While in Parker on April 23, 2019, the home, located at 11092 S. Hayloft St. and resided in by Mi Yoon and Sung Jeung was burglarized with personal property, aggregated in value at be approximately \$2,800.00, stolen. It should be noted that the occupants of the home operated a restaurant in Centennial. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of Call Detail Records (CDR) associated with one or more members of the enterprise.

COUNT THIRTY-FIVE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about June 5, 2019, in the State of Colorado, **Santiago Hoyos Gaviria and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Tim Lu and/or Mei Ying Zhang, located at 5479 Mills Lake Ct., Timnath, CO with the intent to commit therein the crime of Theft and/or Criminal Mischief; in violation of section 18-4-203(1),(2)(a), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offense alleged in **Count Thirty-Five** was committed in the following manner and serve as the non-exclusive, essential facts:

On June 5, 2019 the above named individuals in Count Thirty-Five were also in Timnath, Larimer County CO when a home was burglarized with real and/or personal property being stolen. This burglary occurred earlier in the day before the named individuals went to Timnath to commit the burglary and theft that was cited above. While in Timnath on June 5, 2019, the home, located at 5479 Mills Lake Ct. and resided in by Tim Lu and Mei Ying Zhang was burglarized with property, aggregated and valued at less than \$750.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Loveland. Law enforcement officials were able to identify the named defendants for this residential burglary through a variety of sources, including, but not limited to a review of video and BERLA/Vehicle Infotainment data from a rental vehicle.

COUNT THIRTY-SIX

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about June 7, 2019, in the State of Colorado, **Santiago Hoyos Gaviria and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Shiva Shrestha, Hem Shrestha, Dourga Shrestha, Devi Shrestha and/or Rohita Shrestha, located at 1498 Clover Creek Dr., Longmont, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTY-SEVEN

THEFT - \$100,000 - \$1,000,000, C.R.S. 18-4-401(1),(2)(I) (F3)

On or about June 7, 2019, in the State of Colorado, **Santiago Hoyos Gaviria and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Shiva Shrestha, Hem Shrestha, Dourga Shrestha, Devi Shrestha and/or Rohita Shrestha, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Shiva Shrestha, Hem Shrestha, Dourga Shrestha, Devi Shrestha and/or Rohita Shrestha, with the value of one hundred thousand dollars or more but less than one million thousand dollars, and intended to deprive Shiva Shrestha, Hem Shrestha, Dourga Shrestha, Devi Shrestha and/or Rohita Shrestha,, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(i), C.R.S.

COUNT THIRTY-EIGHT

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about June 7, 2019, in the State of Colorado, **Santiago Hoyos Gaviria and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Jian Lin Li and/or Fu Lian Xian, located at 321 Big Horn Dr. #B5, Estes Park, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT THIRTY-NINE

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) (F4)

On or about June 7, 2019, in the State of Colorado, **Santiago Hoyos Gaviria and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Jian Lin Li and/or Fu Lian Xian without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed, a thing of value, namely: personal property (including, but not limited to cash and jewelry) of Jian Lin Li and/or Fu Lian Xian with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Jian Lin Li and/or Fu Lian Xian, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Thirty-Six through Thirty-Nine** were committed in the following manner and serve as the non-exclusive, essential facts:

On June 7, 2019 the above named individuals in Counts Thirty-Six and Thirty-Seven were also in Longmont, Boulder County, CO when a home was burglarized with real and/or personal property being stolen. While in Longmont on June 7, 2019, the home, located at 1498 Clover Creek Dr. and resided in by Shiva Shrestha, Hem Shrestha, Dourga Shrestha, Devi Shrestha and/or Rohita Shrestha was burglarized with property, aggregated and valued at \$229,900.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Estes Park.

On June 7, 2019 the above named individuals in Counts Thirty-Eight and Thirty-Nine were also in Estes Park, Larimer County, CO when a home was burglarized with real and/or personal property being stolen. While in Estes Park on June 7, 2019, the home, located at 321 Big Horn Dr. #B5 and resided in by Jian Lin Li and Fu Lian Xian was burglarized with property, aggregated and valued at \$37,000.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Estes Park.

Law enforcement officials were able to identify the named defendants for these residential burglaries through a variety of sources, including, but not limited to a review of video and BERLA/Vehicle Infotainment data associated with a rental vehicle.

COUNT FORTY

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about July 18, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Ken Cheng, Jingu Qin, Chloe Ruan, Yeufu Teng, and/or Gamaliel Canche located at 281 N. 6th Ave., Frisco, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FORTY-ONE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5)

On or about July 18, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Ken Chong, Jingu Qin, Chloe Ruan, Yeufu Teng, and/or Gamaliel Canche, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash, jewelry, a computer, a wallet and alcohol) of Ken Cheng, Jingu Qin, Chloe Ruan, Yeufu Teng, and/or Gamaliel Canche, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Ken Chong, Jingu Qin, Chloe Ruan, Yeufu Teng, and/or Gamaliel Canche, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT FORTY-TWO

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about July 18, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Yuer Huang, Ming Hon Yu, and/or Chih Wei Lo located at 3402 Ryan Gulch Rd., Silverthorne, Summit County, CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FORTY-THREE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5)

On or about July 18, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Yuer Huang, Ming Hon Yu, and/or Chih Wei Lo without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: personal property (including, but not limited to cash) of Yuer Huang, Ming Hon Yu, and/or Chih Wei Lo, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Yuer Huang, Ming Hon Yu, and/or Chih Wei Lo, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT FORTY-FOUR

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about July 18, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Manik Sakya, located at 1111 Westlook Dr., Glenwood Springs CO with the intent to commit therein the crime of Theft and/or Criminal Mischief; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FORTY-FIVE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(A) (F3)

On or about July 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Lian Shui Fu, Wei-Rong Fu, and/or Guan Gu, located at 171 Orchard Ln, Glenwood Springs CO with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1),(2)(a), C.R.S.

COUNT FORTY-SIX

THEFT - \$100,000 - \$1,000,000, C.R.S. 18-4-401(1),(2)(I) (F3)

On or about July 19, 2019, in the State of Colorado, **Santiago Hoyos Gaviria, Yenny Zoraya Rodas Florez and Jhon Eder Florez Molina** unlawfully, feloniously, and knowingly took a thing of value, namely: personal property of Lian Shui Fu, Wei-Rong Fu, and/or Guan Gu, without authorization or by threat or deception; obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of,, a thing of value, namely: personal property (including, but not limited to Cash, jewelry, gold bars and a safe) of Lian Shui Fu, Wei-Rong Fu, and/or Guan Gu, with the value of one hundred thousand dollars or more but less than one million thousand dollars, and intended to deprive Lian Shui Fu, Wei-Rong Fu, and/or Guan Gu, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(i), C.R.S.

Along with the incorporation of the essential facts that were cited elsewhere in this Indictment, the offenses alleged in **Counts Forty through Forty-Six** were committed in the following manner and serve as the non-exclusive, essential facts:

On July 18, 2019 the above named individuals in Counts Forty and Forty-One were in Summit County, CO when a home was burglarized with real and/or personal property being stolen. While in Summit County on June 18, 2019, the home, located at 281 N. 6th in Frisco and resided in by Ken Cheng, Jingu Qin, Chloe Ruan, Yeufu Teng, and/or Gamaliel Canche was burglarized with property, aggregated and valued at \$9,560.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Frisco.

On July 18, 2019 the above named individuals in Counts Forty-Two and Forty-Three were also in Summit County CO when another home was burglarized with real and/or personal property being stolen. While in Summit County on July 18, 2019, the home, located at 3402 Ryan Gulch Rd in Silverthorne and resided in by Yuer Huang, Ming Hon Yu, and/or Chih Wei Lo was burglarized with property, aggregated and valued

at approximately \$5,000.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Summit County.

On July 18, 2019 the above named individuals in Count Forty-Four were also in Glenwood Springs, Garfield County, CO when another home was burglarized with real and/or personal property being damaged. While in Glenwood Springs on July 18, 2019, the home, located at 1111 Westlook Dr. and resided in by Manik Sakya was burglarized with property, aggregated and valued at approximately \$500.00 being damaged. It should be noted that the occupants of the home operated a restaurant in Glenwood Springs.

On July 19, 2019 the above named individuals in Counts Forty-Five and Forty-Six were also in Glenwood Springs, Garfield County, CO when another home was burglarized with real and/or personal property being stolen. While in Glenwood Springs on July 19, 2019, the home, located at 171 Orchard Ln. and resided in by Lian Shui Fu, Wei-Rong Fu, and/or Guan Gu was burglarized with property, aggregated and valued at approximately \$250,000.00 being stolen. It should be noted that the occupants of the home operated a restaurant in Glenwood Springs.

Law enforcement officials were able to identify the named defendants for these residential burglaries through a variety of sources, including, but not limited to a review of True Call data and Call Data Records (CDR).

PHILIP J. WEISER

Attorney General



ROBERT SHAPIRO, 26869

First Assistant Attorney General

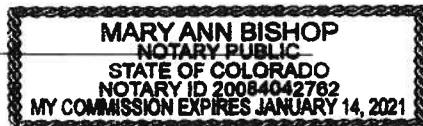
Special Prosecutions Unit

Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado, this
16th day of July, 2020.


Notary Public

My commission expires: _____



The 2019-2020 Colorado Statewide Grand Jury presents the Indictment contained within and the same is hereby ORDERED FILED this 16th day of July, 2020.

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

Arrest Warrants are Issued for:

Santiago Hoyos Gaviria, with a bond set at \$ 100,000.00 c/s, with the following conditions: surrender all passports; GPS monitoring; no contact of victims

Yenny Zoraya Rodas Florez, with a bond set at \$ 100,000.00 c/s, with the following conditions: surrender all passports; GPS monitoring; no contact of victim

Jhon Eder Florez Molina, with a bond set at \$ 100,000.00 c/s, with the following conditions: surrender all passports; GPS monitoring; no contact of victims

W. A. W.
Chief District Court Judge, Second Judicial District
and Presiding Judge of the Statewide Grand Jury