

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>NATHANIEL TSOSIE (D.O.B. 04/07/1987) CRAIG KELTNER (D.O.B. 02/14/1995) JUSTIN JAMESON, (DOB 09/12/1982) ANDREA WETTIG (D.O.B. 11/01/1996) DUSTIN LEE JAMES (D.O.B. 08/14/1986)</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General Sarah McCutcheon #33242 * Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6700 *Counsel of Record</p>	<p>Case No.:</p> <p>GJ Case No.: 22CR0001</p> <p>Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

CHARGES:

- | | |
|-------------|---|
| COUNT ONE | VIOLETION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—PARTICIPATION IN AN ENTERPRISE—PATTERN OF RACKETEERING, C.R.S. § 18-17-104(3) [F2] 37284 |
| COUNT TWO | VIOLETION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—PARTICIPATION IN AN ENTERPRISE—CONSPIRACY, C.R.S. § 18-17-104(4) [F2] 37285 |
| COUNT THREE | IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H |

COUNT FOUR FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. 18-5-102(1)(C) [F5] **1001C**

COUNT FIVE CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT SIX THEFT - \$750 - \$2000, C.R.S. 18-4-401(1),(2)(D) [M1] **08A12**

COUNT SEVEN AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT EIGHT AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT NINE IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] **1307H**

COUNT TEN CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT ELEVEN AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT TWELVE IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] **1307H**

COUNT THIRTEEN CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT FOURTEEN AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT FIFTEEN IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] **1307H**

COUNT SIXTEEN	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT SEVENTEEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT EIGHTEEN	THEFT - \$2000 - \$5000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
COUNT NINETEEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT TWENTY	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
COUNT TWENTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT TWENTY-TWO	THEFT - \$750 - \$2000, C.R.S. 18-4-401(1),(2)(D) [M1] 08A12
COUNT TWENTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT TWENTY-FOUR	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT TWENTY-FIVE	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT TWENTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

COUNT TWENTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT TWENTY-EIGHT	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT TWENTY-NINE	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT THIRTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT THIRTY-ONE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
COUNT THIRTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT THIRTY-THREE	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A15
COUNT THIRTY-FOUR	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT THIRTY-FIVE	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT THIRTY-SIX	FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. 18-5-102(1)(C) [F5] 1001C
COUNT THIRTY-SEVEN	VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT THIRTY-EIGHT	POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE-

	METHAMPHETAMINE, HEROIN, KETAMINE, OR CATHINONES - MORE THAN 112 GRAMS, C.R.S. 18-18- 405(1),(2)(A)(I)(B) [DF1] 8104B
COUNT THIRTY-NINE	POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE - SCHEDULE I OR II, C.R.S. 18-18-405(1),(2)(C)(I) [DF3] 81046
COUNT FORTY	POSSESSION OF A CONTROLLED SUBSTANCE - SCHEDULE I, II, FLUNITRAZEPAM, KETAMINE, CATHINONES, C.R.S. 18-18-403.5(1),(2)(A) [DF4] 8101B
COUNT FORTY-ONE	SPECIAL OFFENDER - FIREARM, C.R.S. 18-18- 407(1)(D)(II) [DF1] 33A46
COUNT FORTY-TWO	POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER - WEAPON, C.R.S. 18-12-108(1) [F6] 3007A
COUNT FORTY-THREE	CRUELTY TO ANIMALS - NEGLECT OR MISTREAT, C.R.S. 18-9-202(1)(A) [M1] 2801A
COUNT FORTY-FOUR	CRIMINAL POSSESSION OF A FINANCIAL DEVICE - FOUR OR MORE AND TWO DIFFERENT NAMES, C.R.S. 18-5-903(1),(2)(C) [F5] 13083
COUNT FORTY-FIVE	CRIMINAL POSSESSION OF IDENTIFICATION DOCUMENTS - MULTIPLE VICTIMS, C.R.S. 18-5- 903.5(1),(2)(B) [F6] 13087
COUNT FORTY-SIX	IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
COUNT FORTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

COUNT FORTY-EIGHT	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT FORTY-NINE	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT FIFTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FIFTY-ONE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
COUNT FIFTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT FIFTY-THREE	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT FIFTY-FOUR	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT FIFTY-FIVE	SECOND DEGREE CRIMINAL TRESPASS - ENCLOSED/FENCED AREA, C.R.S. 18-4-503(1) (A) [M3] 09036
COUNT FIFTY-SIX	CRIMINAL MISCHIEF - UNDER \$300, C.R.S. 18-4-501(1),(4)(A) [M3] 0901F
COUNT FIFTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

COUNT FIFTY-EIGHT AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT FIFTY-NINE IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] **1307G**

COUNT SIXTY CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT SIXTY-ONE AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT SIXTY-TWO IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] **1307G**

COUNT SIXTY-THREE CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT SIXTY-FOUR SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] **06031**

COUNT SIXTY-FIVE THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] **08A14**

COUNT SIXTY-SIX IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] **1307G**

COUNT SIXTY-SEVEN CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] **1011F**

COUNT SIXTY-EIGHT PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] **41105**

COUNT SIXTY-NINE	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT SEVENTY	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT SEVENTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT SEVENTY-TWO	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A15
COUNT SEVENTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT SEVENTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT SEVENTY-FIVE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT SEVENTY-SIX	THEFT - \$300 - \$750, C.R.S. 18-4-401(1),(2)(D) [M2] 08A11
COUNT SEVENTY-SEVEN	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT SEVENTY-EIGHT	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT SEVENTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

COUNT EIGHTY	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
COUNT EIGHTY-ONE	CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
COUNT EIGHTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT EIGHTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE – LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT EIGHTY-FOUR	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT EIGHTY-FIVE	THEFT - \$2000 - \$5000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
COUNT EIGHTY-SIX	PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] 41105
COUNT EIGHTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
COUNT EIGHTY-EIGHT	PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] 41105
COUNT EIGHTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

COUNT NINETY

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST
DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5)
[F4] **0804H**

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>NATHANIEL TSOSIE (D.O.B. 04/07/1987) CRAIG KELTNER (D.O.B. 02/14/1995) JUSTIN JAMESON, (DOB 09/12/1982) ANDREA WETTIG (D.O.B. 11/01/1996) DUSTIN LEE JAMES (D.O.B. 08/14/1986)</p> <p>Defendants.</p>	<p style="text-align: center;">^ COURT USE ONLY ^</p>
<p>PHILIP J. WEISER, Attorney General Sarah McCutcheon #33242 * Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6700 *Counsel of Record</p>	<p>Case No.: GJ Case No.: 22CR0001 Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2022-2023 term of the Denver District Court in the year 2022; the 2022-2023 Colorado State 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:

INDEX OF COUNTS

Defendant	Counts Applicable
Nathaniel Tsosie	1-4, 7-13, 17-22, 23-25, 30-31, 33-46, 61-67, 71, 72, 75-78
Craig Keltner	1, 2, 14-16, 23-32, 47-56, 62-67, 68-74, 79-90
Justin Jameson	1, 2, 57-60, 71, 72
Andrea Wettig	1, 2, 71, 72
Dustin Lee James	3-6

COUNT ONE
VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—PATTERN OF RACKETEERING, C.R.S. § 18-17-
104(3) [F2] 37284

Between and including December 31, 2019 and March 20, 2021, in the State of Colorado, **Nathaniel Tsosie, Craig Keltner, Justin Jameson, and Andrea Wettig**, while employed by or associated with an enterprise as defined by § 18-17-103(2), C.R.S., as amended, namely: a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT TWO
VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—CONSPIRACY, C.R.S. § 18-17-104(4) [F2] 37285

Between and including December 31, 2019 and March 20, 2021, in the State of Colorado, **Nathaniel Tsosie, Craig Keltner, Justin Jameson, and Andrea Wettig**, did unlawfully, feloniously, and knowingly conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of section 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:

THE ENTERPRISE

The enterprise alleged in Counts One and Two is a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: Nathaniel Tsosie, Craig Keltner, Justin Jameson, Dustin James, Andrea Wettig, Marti Davis, David Powell, Riley Fisher, and other persons known and unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

The enterprise consists of people identified above working in concert with each other and, at times, with other parties of known or unknown identity, for the purpose of stealing motor vehicles and burglarizing structures such storage units to steal their contents, including personal identifying and financial information, among other offenses. Mailboxes also provided a source for theft of personal identifying information and financial information. Personal identifying information and financial information was typically derived from stolen mail, identifications, and other documents. Members of the enterprise used stolen identifying information to create fictitious accounts at storage unit facilities. These fraudulent accounts were then used to gain access to the facility, and in turn burglarize other units within the facility.

Members of the enterprise used a consistent method to deprive retail dealerships of motor vehicles, namely, requesting to test drive a motor vehicle using a false and/or stolen identity and fictitious identifying information. Thereafter, vehicles were not returned to the dealership, and may be used by members of the enterprise for their personal use, to facilitate other criminal offenses,

and to transport stolen property. Members of the enterprise displayed incorrect tags or plates on stolen vehicles, and at times used other methods to conceal the identity of the stolen vehicles. Members of the enterprise frequently and consistently used the same fictitious identifying information, and a significant amount of overlap occurred between the members of the enterprise and the information used, *e.g.* multiple members would at times use the same fictitious phone number at different dealerships in furtherance of test drives. The individuals' whose personal identifying information and financial information was compromised were numerous, and members of the enterprise possessed several fraudulent identifying documents, including documents with stolen identifying information and a member of the enterprise's photo.

At no point in the investigation did officers determine that any individual had consented to members of the enterprise possessing their personal identifying and financial information. Members of the enterprise stole motor vehicles and committed burglaries for their personal use and to perpetuate their on-going criminal activity. The members of the enterprise benefitted from the use of stolen vehicles and stolen personal and identifying information to fund living expenses and their continued ability to commit additional offenses absent other legitimate sources of income or employment. Funds derived from criminal activity may have also been used to fund inmate accounts for members of the enterprise incarcerated and/or potentially to post their bonds.

PATTERN OF RACKETEERING ACTIVITY

Nathaniel Tsosie, Craig Keltner, Justin Jameson, and Andrea Wettig, 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, 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:

Aggravated Motor Vehicle Theft, § 18-4-409
Possession of a Controlled Substance, § 18-18-403.5
Criminal Impersonation, §18-5-113
Identity Theft, § 18-5-902
Criminal Possession of a Financial Device, § 18-5-903
Possession with Intent to Manufacture or Distribute a Controlled Substance, § 18-18-405
Second Degree Burglary, § 18-4-203
Criminal Possession of Identification Documents, § 18-5-903.5
Forgery, § 18-5-102
Theft, § 18-4-401

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, all identified as counts listed above, including any lesser included offenses: Uncharged Acts of Racketeering A-E; and Count Three through Count 90 (with the exception of Counts 42, 43, 68, 86, and 88) are alleged as predicate acts for Counts

One and Two. In addition, the offenses alleged in Counts One and Two were committed in the manner described immediately below and described in the factual summaries in support of the following counts, incorporated by reference.

UNCHARGED ACT OF RACKETEERING A
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 5)

Between and including January 28, 2021 to February 15, 2021, in the State of Colorado, **Justin Jameson** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Interstate Ford, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, , and/or and attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

UNCHARGED ACT OF RACKETEERING B
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 5)

Between and including January 28, 2021 to February 12, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of CarMax, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The offenses alleged in Uncharged Acts of Racketeering A and B were committed in the manner described in support of Counts 57 through 78, set forth below in Series 5, and incorporated by reference herein.

UNCHARGED ACT OF RACKETEERING C
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 7)

Between and including March 13, 2021 to March 21, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of O'Meara Ford, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

UNCHARGED ACT OF RACKETEERING D
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 7)

On or about March 18, 2021, in the State of Colorado, **Andrea Wettig** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Go Chevrolet, without authorization, and used the motor vehicle in the commission of the crimes of Vehicular Eluding as set forth in section 18-9-116.5, C.R.S., and Attempted First Degree Assault on a Peace Officer as set forth in section 18-3-202, C.R.S., and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

UNCHARGED ACT OF RACKETEERING E
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 7)

Between and including March 20, 2021 to March 21, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Larry H. Miller Chrysler Dodge, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and used the motor vehicle in the commission of the crimes of Attempted Murder as set forth in section 18-3-102, C.R.S., Assault on a Peace Officer as set forth in section 18-3-202, C.R.S., Attempted Burglary as set forth in section 18-4-203, C.R.S., and Possession of Controlled Substances as set forth in section 18-18-403, C.R.S., and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The offenses alleged in Uncharged Acts of Racketeering C, D, and E were committed in the manner described in support of Counts 79 through 90 set forth below in Series 7, and incorporated by reference herein.

COUNT THREE
IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
(Series 1)

Between and including December 31, 2019 and January 4, 2020, in the State of Colorado, **Nathaniel Tsosie** and **Dustin James** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of Michael Ruby and/or New West Services, Inc. without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT FOUR

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. 18-5-102(1)(C) [F5]

1001C

(Series 1)

Between and including December 31, 2019 and January 4, 2020, in the State of Colorado, **Nathaniel Tsoie** and **Dustin James** with the intent to defraud Michael Ruby, New West Services, and/or Money Tree, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a check, deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT FIVE

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F

(Series 1)

Between and including December 31, 2019 and January 4, 2020, in the State of Colorado, **Dustin James** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Daniel Neuhaus, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SIX

THEFT - \$750 - \$2000, C.R.S. 18-4-401(1),(2)(D) [M1] 08A12

(Series 1)

Between and including December 31, 2019 and January 4, 2020, in the State of Colorado, **Dustin James** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: cash, of Michael Ruby, New West Services Inc., and/or Money Tree, with the value of seven hundred and fifty dollars or more but less than two thousand dollars, and intended to deprive Michael Ruby, New West Services, and/or Money Tree permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(d), C.R.S.

COUNT SEVEN

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H**

(Series 1)

Between and including August 7, 2020 and August 17, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Courtesy Acura, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully

attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT EIGHT

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 1)

On or about August 7, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Larry H. Miller Ford, without authorization, or by threat or deception, and attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT NINE

IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
(Series 1)

On or about August 7, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of Ryan Carroll without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT TEN

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 1)

On or about August 7, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Ryan Carroll, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The offenses alleged in Counts Three through Ten were committed in the following manner:

On or about January 2, 2020, Nathaniel Tsosie entered the Money Tree location at 6901 West Alameda Avenue, City of Lakewood, Jefferson County Colorado. While at that location, Tsosie attempted to cash two checks on the accounts of victim Michael Ruby and his business

New West Services Inc.—one made out to Nathaniel Tsosie and one made out to TSolutions LLC. Ruby had not authorized either check to either payee, and neither check was cashed at that time. Both of these checks were made out in the amount of \$3725.81. *See Grand Jury Exhibit 1, Slides 31-32.*

On or about January 3, 2020, Dustin James entered the same West Alameda Avenue Money Tree location and successfully cashed a check made payable to “Daniel Neuhaus” on an account belonging to Michael Ruby and New West Services Inc. in the amount of \$1725.81. Daniel Neuhaus was actually deceased as of that date and time and was otherwise not a legitimate identity for James. Similarly, Ruby had not authorized this check as payable to Deuhaus and/or James. Tsosie and James were both identified as present in the West Alameda Avenue Money Tree location on January 2 and 3, 2020 from video surveillance footage from that business. *See Grand Jury Exhibit 1, Slides 31-32.*

Additional checks on accounts belonging to Michael Ruby and/or New West Services Inc. were attempted to be cashed at another Money Tree location in the City of Aurora, State of Colorado consistent with the above dates. These checks were made payable to Dulcinea Prai and Derek Huffman. No video surveillance from the City of Aurora Money Tree location was available at that time. *See Grand Jury Exhibit 1, Slides 31-32.* Later in February 2021, a fictitious drivers license with Tsosie’s photograph and the name “Derek Huffman” was recovered from a stolen vehicle in Wyoming *See Counts 57 through 78, Series 5, incorporated by reference herein.*

On or about 11:00 a.m. on August 7, 2020, a white male using an identification and insurance card for “Ryan Carroll” entered Courtesy Acura, located at 7590 South Broadway, City of Littleton, Arapahoe County, State of Colorado. The male requested to test drive a 2013 black Audi S4, bearing tag 113BBB, VIN WAUBGAFL1DA15358, valued at \$22,000.00. The vehicle was not returned on that date. *See Grand Jury Exhibit 1, Slide 35.*

On or about August 7, 2020, an individual representing himself as “Ryan Carroll” entered the Larry H. Miller Ford dealership, located at 11595 West 6th Avenue, Frontage Road, City of Lakewood, Jefferson County, State of Colorado. Using identification documents for “Ryan Carroll” the individual then left the dealership for a test drive with a 2019 Ford F-150 Raptor pickup truck, VIN 1FTFW1RG4KFA11727, valued at \$60,000.00. The individual did not return the truck to the dealership. *See Grand Jury Exhibit 1, Slide 35.*

That same evening, employees of the dealership tracked the 2019 Ford Raptor to a Public Storage, located at 5788 West 6th Avenue, Frontage Road South, City of Lakewood, Jefferson County, State of Colorado. The Larry H. Miller employees found the 2019 Ford Raptor in the possession of a white male, later identified as Tsosie, and a female, suspected to be and tentatively identified as Samantha Gonzales-Ramirez. The employees used their vehicle to block the 2019 Ford Raptor’s exit from the Public Storage lot, and confronted the white male. The male stated that he intended to return the pickup truck to the dealership, but ultimately returned the keys and the vehicle to the employees. Upon return, the dealership employee found that the 2019 Ford Raptor’s appearance had been altered and there was damage to the vehicle, including but not limited to: two rear floor panels, which housed wiring harnesses for the truck, had been

pried up, the tailgate, dashboard, and passenger inside B column were damaged, the dealership tag had been removed from the key fob, dealership window stickers and papers had been removed, and the front bumper “Larry H. Miller” license plate had been removed. The employees estimated that the damage to the vehicle exceeded \$500.00 in repairs. *See Grand Jury Exhibit 1, Slide 35.*

Larry H. Miller employees in contact with the white male on August 7, 2020 positively identified a photo of Tsosie as the male they had contacted with the vehicle at the West 6th Avenue Public Storage. Surveillance video from the Public Storage from that date and time, depicting the confrontation between the dealership employees and the male with the 2019 Ford Raptor is also consistent with Tsosie. *See Grand Jury Exhibit 1, Slides 36-37.*

Tsosie also had rented a storage unit at the West 6th Avenue Public Storage (Unit A88) in August 2020. On or about August 8, 2020, video surveillance from that business captured a black Audi A4 sedan, with Colorado license plate CES 819, occupied by Tsosie. On that same date, City of Lakewood Police Department Officers contacted Tsosie at the Public Storage in the passenger side of a parked black Audi A4, bearing Colorado license plate CES 819. *See Grand Jury Exhibit 1, Slides 38-39.*

On or about August 17, 2020, law enforcement recovered the Courtesy Acura 2013 Audi S4 at an ARC Thrift Store, located at 1400 W. Littleton Blvd., City of Littleton, Arapahoe County, State of Colorado. At that time, the 2013 Audi S4 displayed the Colorado plate CES 819 previously seen on the Audi sedan occupied by Tsosie on August 8, 2020 described above. The Courtesy Acura 2013 Audi S4 was parked next to a Toyota. Officers contacted Marti Davis and an unidentified female who stated that the Toyota belonged to her boyfriend. A purse for a “Sonia Ramirez” was also located in the Courtesy Acura Audi. Ramirez later drove the Toyota from the ARC Thrift location. *See Grand Jury Exhibit 1, Slides 33-34.*

Officers also discovered two canines located in the Courtesy Acura Audi, a Pit Bull and a small brown dog—both dogs were taken to an animal shelter. Later, Davis contacted the shelter about these dogs, identifying them as “Theo” and “Fizmo.” Tsosie also contacted the shelter to inquire about his Pit Bull and Maltese dog that were taken from the ARC Thrift Store parking lot by the Littleton Police Department. Tsosie presented his Colorado drivers license when claiming the dogs at the shelter on August 18, 2020. *See Grand Jury Exhibit 1, Slides 33-34.*

COUNT ELEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 2)

Between and including October 16, 2020 and December 1, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Key Auto, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty

thousand dollars or more but less than one hundred thousand dollars, in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT TWELVE

IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
(Series 2)

On or about October 16, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of Gareth Webb without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT THIRTEEN

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 2)

On or about October 16, 2020, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Gareth Webb, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT FOURTEEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 2)

Between and including November 30, 2020 and December 4, 2020, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Family Trucks and Vans Dealership, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and/or and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT FIFTEEN

IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
(Series 2)

On or about November 30, 2020, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying

information, or financial device of Shane Dee Wilson without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

COUNT SIXTEEN

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 2)

On or about November 30, 2020, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Shane Dee Wilson, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SEVENTEEN

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 2)

Between and including October 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of James Hickey Keohane and/or Extra Space Storage, located at 197 Inverness Drive West, Arapahoe County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT EIGHTEEN

THEFT - \$2000 - \$5000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
(Series 2)

Between and including October 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a generator, scuba diving gear, ammunition reloading equipment, and other miscellaneous personal property, of James Hickey Keohane, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive James Hickey Keohane permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(f), C.R.S.

COUNT NINETEEN

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 2)

Between and including November 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied

structure of Gerald Ballard and/or Extra Space Storage, located at 197 Inverness Drive West, Arapahoe County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT TWENTY

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
(Series 2)

Between and including November 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: ammunition, reloading equipment, and other miscellaneous personal property, of Gerald Ballard, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Gerald Ballard permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g), C.R.S.

COUNT TWENTY ONE

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 2)

Between and including October 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Justin and Mria Gamble and/or Self Storage, located at 8950 Marshal Court, City of Westminster, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT TWENTY TWO

THEFT - \$750 - \$2000, C.R.S. 18-4-401(1),(2)(D) [M1] 08A12
(Series 2)

Between and including October 1, 2020 and November 30, 2020, in the State of Colorado, **Nathaniel Tsoie** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: musical instruments, an Amazon TV Firestick, miscellaneous papers and other miscellaneous personal property of Justin and Mria Gamble, with the value of seven hundred and fifty dollars or more but less than two thousand dollars, and intended to Justin and Mria Gamble permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(d), C.R.S.

The offenses alleged in Counts Eleven through Twenty Two were committed in the following manner:

On or about October 16, 2020, a male using an identification and insurance card of “Gareth Webb” and a phone number of 970-214-2280, requested a test drive of a 2014 black

Audi S6 Quattro, tag 939-EZV, VIN WAUF2AFCXEN111786, valued at \$30,999, belonging to Key Auto, located at 4400 S. Broadway, City of Englewood, Arapahoe County, State of Colorado. Thereafter, the vehicle was not returned to the dealership. *See* Grand Jury Exhibit 1, Slide 40.

On or about December 1, 2020, the Denver Police Department responded to a report of suspicious vehicles at 1050 Lafayette Street, City and County of Denver, Stated of Colorado. Upon responding to that location, officers recovered the Key Auto 2014 Audi S6. The stolen Audi displayed a fictitious temporary tag, #2479506. *See* Grand Jury Exhibit 1, Slide 40.

On or about December 5, 2020, a male claiming to be a Denver Police Department officer entered the Key Auto dealership and inquired about items recovered from the 2014 Audi S6. *See* Grand Jury Exhibit 1, Slide 40, 50. Video footage taken from this contact inside the dealership identified Nathaniel Tsosie as the male posing as a Denver Police Department officer. The video depicts Tsosie as unmasked and displaying a purported law enforcement badge. *See* Grand Jury Exhibit 1, Slide 40, 50. Items recovered from the Key Auto 2014 Audi S6 included a lending notice related to Timothy Mackey, miscellaneous papers, a temporary Colorado drivers license and a State of Indiana drivers license for Aaron Van Dyke, state of Colorado temporary tags 2479506 and 2494854, a red Milwaukee brand power saw, a Yamaha drum, and several pages of counterfeit checks. *See* Grand Jury Exhibit 1, Slide 40. Significantly, in November 2020, Tsosie was associated with a storage unit rented under the name Timothy Mackey located at Extra Space Storage, 197 Inverness Drive West, Arapahoe County, State of Colorado. Webb's insurance card was recovered from a storage unit rented by Marti Davis in Jefferson County in February 2021, as set forth in Counts 57 through 78, Series 5, incorporated by reference herein.

On or about December 1, 2020, at the time the officers recovered the Key Auto 2014 Audi S6 at the Lafayette Street location, they also contacted a female identified as Rachelle Brind, DOB: 08/14/1989, in black 2018 Dodge Ram 1500 pickup parked near the Audi. Upon contact, Brind stated she was waiting for her husband. Thereafter, a male arrived on scene and was identified as Craig Keltner. Keltner identified the black Dodge Ram as belonging to his friend "Greg." *See* Grand Jury Exhibit 1, Slides 40-42.

Officers later checked the license plate BCCB42 and VIN #1C6RR7YT5JS162241 of the black Dodge Ram pickup that Keltner and Brind were contacted in on December 1, 2020 and found they did not match. Subsequent investigation revealed that this pickup was previously reported stolen from the Family Trucks and Vans Dealership located at 2400 South Broadway, Denver, City and County of Denver, State of Colorado, on November 30, 2020. On or about November 30, 2020, dealership employees described a tall white male with blond or strawberry hair wearing a black and green gaiter and possessing a driver's license in the name of Shane Dee Wilson (DOB: 09/24/1977) requesting a test drive and failing to return the vehicle. Thereafter, Denver Police Department detectives contacted Shane Wilson, who reported that his drivers license was stolen six to seven months prior while at a Ramada Hotel and he denied stealing the Dodge Ram from the dealership. *See* Grand Jury Exhibit 1, Slides 40-42.

On December 4, 2020, Wheatridge Police Department officers recovered the Family Trucks and Vans Dealerships 2108 black Dodge Ram in the parking lot of the American Motel,

located at 10101 I-70 Frontage Road North, City of Wheat Ridge, Jefferson County, State of Colorado. Officers found documents and a copy of a driver's license associated with Zachary Flynn (DOB: 05/13/1988) inside the vehicle. Thereafter, officers contacted Zachary Flynn who was a registered guest at the American Motel. Flynn claimed he got the Dodge Ram from a friend "David," and denied knowing the male depicted in Shane Wilson's driver's license photo. *See Grand Jury Exhibit 1, Slides 40-42.*

In addition, on or about January 6, 2021, Nathaniel Tsosie fled on foot from a crashed black Audi vehicle. Officers recovered the vehicle and processed it for any items of evidentiary value. Officers located a fraudulent driver's license containing Timothy Mackey's identifying information and Shane Dee Wilson's photograph. *See Counts 23 through 46, Series Three, set forth below and incorporated by reference herein. See also Grand Jury Exhibit 1, Slide 43; Grand Jury Exhibit 2, Slide 23.*

On or about March 5, 2021, officers recovered a vehicle stolen from Urban Motors at 6087 Olde Wadsworth, Jefferson County. This is the same location where another stolen vehicle from the Fowler Automotive Honda vehicle had previously been recovered in a month prior, and Keltner was known to stay at unit 210. Officers contacted unit 210, but Keltner was not there. Officers contacted witness Bradley Lemerand in unit 210 who stated the Jeep belonged to "CJ Keltner." Zachary Flynn was also contacted in unit 210 and identified Keltner from a photo. *See Series Seven, Counts 79 through 90, below, incorporated by reference herein.*

Sometime in October through November 2020, James Hickey Keohane's storage unit at Extra Space Storage, 197 Inverness Dr. West, Arapahoe County, was burglarized and items removed without his permission. Keohane reported multiple items as stolen from his unit during this time frame, including but not limited to a generator, dive watch, scuba gear, and ammunition reloading equipment with a total value of \$3,640. *See Grand Jury Exhibit 1, Slide 46.*

Gerald Ballard also rented a storage unit at the Inverness Drive West Extra Space Storage facility. On or about January 21, 2021, Ballard reported his storage unit had also been burglarized sometime in November, 2020. Gerald had last visited or checked his storage unit on or about November 2, 2020 and subsequently discovered it had been burglarized on or about November 30, 2020. Ballard reported ammunition and reloading equipment valued at \$9,100 as missing from his unit. *See Grand Jury Exhibit 1, Slide 48.*

Significantly, Nathaniel Tsosie also rented a storage unit at the Inverness Drive West Extra Space Storage location. In November 2020, Tsosie rented unit 2007 at that location under the name Timothy Mackey. Renters were provided with account specific codes to access the facility. Video footage dated November 3, 2020 showed Tsosie with a white Chevrolet truck at this facility. *See Grand Jury Exhibit 1, Slide 47.* Business records also reflect the Mackey account was used to access that facility on that same date. *See Grand Jury Exhibit 1, Slide 48.*

On November 5, 2020, Tsosie was also in area of the Inverness Drive West Extra Space Storage location. On that date, Riley Fisher was arrested by the Greenwood Village Police Department at I-25 north of Dry Creek Rd., Arapahoe County, after speeding over 100 mph in a black Audi A4 sedan owned by Tsosie. She gave the name Makayla Tsosie to the officer when

she was pulled over. Tsose arrived at the stop a short time later and officers released the vehicle to him. The location of this traffic stop is approximately one mile from Extra Space Storage, 197 Inverness Dr. West, Arapahoe County. Fisher and an unidentified male associated with a dark Audi sedan also used the Mackey access code and were seen on video surveillance footage on November 1, 2020 at Extra Space Storage. *See Grand Jury Exhibit 1, Slides 44-45.*

Property belonging to Keohane and Ballard were subsequently recovered from locations related to Tsose and his known associates. Tsose's known associate Marti Davis rented a storage unit a Security Self Storage, located at 9750 W. Jewell Avenue #K020, City of Lakewood, Jefferson County, State of Colorado. During a subsequent search of Davis's unit, ammunition believed to belong to Ballard and NRA cards, a black range bag, and ammunition believed to belong to Keohane were recovered. *See Counts 57 through 78, Series 5, set forth below and incorporated by reference herein.*

On November 30, 2020, Justin and Mria Gamble reported a burglary to their storage unit at Self Storage, 8950 Marshall Court, City of Westminster, Jefferson County, State of Colorado. Based on their visits to their unit, they believed that the burglary occurred sometime in October or November 2020. The Gambles reported items missing from their unit, including but not limited to a Yamaha trumpet, a King trumpet, a ukulele, a wireless keyboard, an Amazon TV Firestick, and miscellaneous papers with a total value of \$930. *See Grand Jury Exhibit 1, Slide 49.*

On or about February 13, 2021, Nathaniel Tsose was apprehended by the State of Wyoming Highway Patrol following an eluding incident in which he was driving a stolen Dodge Durango. Officers recovered that vehicle after taking Tsose into custody and processed it for any items of evidentiary value. Officers located miscellaneous papers and documents belonging to the Gambles including Justin Gamble's checks and checkbook, and bank statements. *See the material facts included in support of Counts 57 through 78, Series Five, set forth below and incorporated by reference herein.*

Finally, officers subsequently search a storage unit C177 at a Public Storage facility, located at 1398 Simms Street, City of Lakewood, Jefferson County, State of Colorado. The storage unit was rented in the name of Final Concepts, a business entity associated with Nathaniel Tsose and Nathaniel Tsose was an authorized user on the rental account. During the search officers located trumpets and a ukulele belonging to the Gambles. *See the material facts included in support of Counts 57 through 78, Series Five, set forth below and incorporated by reference herein.*

COUNT TWENTY THREE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 3)

Between and including December 15, 2020 and January 6, 2021, in the State of Colorado, **Nathaniel Tsose and Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Auto Nation Chrysler-Jeep West, without

authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and used the motor vehicle in the commission of the crime of Eluding, Identity Theft, Burglary, and Theft as set forth in sections 18-9-116.5, 18-5-902, 18-4-203, 18-4-404, C.R.S., and/or caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT TWENTY FOUR

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1)(A) [F4] 1307G
(Series 3)

On or about December 15, 2020, in the State of Colorado, **Nathaniel Tsoie** and **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Brian Moss without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY FIVE

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 3)

On or about December 15, 2020, in the State of Colorado **Nathaniel Tsoie** and **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Brian Moss, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT TWENTY SIX

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 3)

On or about December 18, 2020, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Skyline Mitsubishi, without authorization, or by threat or deception, and attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT TWENTY SEVEN

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 3)**

Between and including December 18, 2020 and January 7, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Echo Park Automotive, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT TWENTY EIGHT

**IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 3)**

Between and including December 18, 2020 to January 4, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Jakob Holtzmann without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY NINE

**CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 3)**

Between and including December 18, 2020 to January 4, 2021, in the State of Colorado **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Jakob Holtzmann, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT THIRTY

**SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 3)**

Between and including December 31, 2020 and January 2, 2021, in the State of Colorado, **Nathaniel Tsoie** and **Craig Keltner** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Robert Moultrie and/or Public Storage, located at 4370 Youngfield Street, City of Wheatridge, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT THIRTY ONE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
(Series 3)

Between and including December 31, 2020 and January 2, 2021, in the State of Colorado, **Nathaniel Tsoie** and **Craig Keltner** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: tools, fishing gear, computer equipment and a mountain bike, and other miscellaneous personal property, of Robert Moultrie, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Robert Moultrie permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g), C.R.S.

COUNT THIRTY TWO

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 3)

On or about January 4, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Brandon Dodge, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT THIRTY THREE

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A15
(Series 3)

Between and including December 29, 2020 and January 5, 2021, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a check and/or U.S. cash or currency, of Michael and Megan Reisinger and/or Complete Basement Systems, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Michael and Megan Reisinger and/or Complete Basement Systems permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(h), C.R.S.

COUNT THIRTY FOUR

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-
902(1) (A) [F4] 1307G
(Series 3)

Between and including October 1, 2020 to February 28, 2021, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Michael and Megan

Reisinger and/or Timothy Mackey without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT THIRTY FIVE

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 3)

Between and including October 1, 2020 to February 28, 2021, in the State of Colorado **Nathaniel Tsosie** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Timothy Mackey, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT THIRTY SIX

FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. 18-5-102(1)(C) [F5]
1001C
(Series 3)

Between and including December 29, 2020 to January 5, 2021, in the State of Colorado **Nathaniel Tsosie** with the intent to defraud Money Tree, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Secretary of State paperwork; in violation of section 18-5-102(1)(c), C.R.S.

COUNT THIRTY SEVEN

VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie**, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude Arvada Police Department Officers T. Wees and R. Freeman, peace officers also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

COUNT THIRTY EIGHT

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A CONTROLLED SUBSTANCE- METHAMPHETAMINE, HEROIN, KETAMINE, OR CATHINONES - MORE THAN 112 GRAMS, C.R.S. 18-18-405(1),(2)(A)(I)(B) [DF1] 8104B

(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT THIRTY NINE

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

(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Fentanyl, a schedule I or II controlled substance; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

COUNT FORTY

POSSESSION OF A CONTROLLED SUBSTANCE - SCHEDULE I, II, FLUNITRAZEPAM, KETAMINE, CATHINONES, C.R.S. 18-18-403.5(1),(2)(A) [DF4] 8101B

(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained Methamphetamine and/or Fentanyl, schedule I or II controlled substances; in violation of section 18-18-403.5(1),(2)(a), C.R.S.

Further, the amount possessed was more than 4 grams, per 18-1.3-103.5(3)(a).

COUNT FORTY ONE

SPECIAL OFFENDER - FIREARM, C.R.S. 18-18-407(1)(D)(II) [DF1] 33A46

(Series 3)

On or about January 6, 2021, in the State of Colorado **Nathaniel Tsosie** committed the felony offenses charged in counts 38, 39, and 40 and the defendant or a confederate of the defendant possessed a firearm in a vehicle the defendant was occupying during the commission of the offense; in violation of section 18-18 -407(1)(d)(II), C.R.S.

COUNT FORTY TWO
POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER - WEAPON, C.R.S. 18-12-108(1) [F6] 3007A
(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: an Anderson Arms AR-15 rifle, and Nathaniel Tsosie was previously convicted of a felony, namely: Second Degree Burglary, as defined by Colorado, C.R.S. § 18-4-203(1), on October 24, 2012; in violation of section 18-12-108(1), C.R.S.

COUNT FORTY THREE
CRUELTY TO ANIMALS - NEGLECT OR MISTREAT, C.R.S. 18-9-202(1)(A) [M1] 2801A
(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, knowingly, recklessly, or with criminal negligence, carried or confined in or upon a vehicle in a cruel or reckless manner, or otherwise mistreated or neglected, or caused or procured the mistreatment or neglect of an animal; in violation of section 18-9-202(1)(a), C.R.S.

COUNT FORTY FOUR
CRIMINAL POSSESSION OF A FINANCIAL DEVICE - FOUR OR MORE AND TWO DIFFERENT NAMES, C.R.S. 18-5-903(1),(2)(C) [F5] 13083
(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully and feloniously possessed or controlled four or more financial devices of which at least two were issued to different account holders, that the defendant knew or reasonably should have known were lost, stolen, or delivered under a mistake as to the identity or address of the account holders; in violation of section 18-5-903(1),(2)(c), C.R.S.

COUNT FORTY FIVE
CRIMINAL POSSESSION OF IDENTIFICATION DOCUMENTS - MULTIPLE VICTIMS, C.R.S. 18-5-903.5(1),(2)(B) [F6] 13087
(Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, knowingly, and feloniously had in his possession or under his control an actual driver's license, actual government-issued identification card, actual social security card, or actual passport of Nathan Thomas Soto, Chadwick Douglas Moon, Nikolas Levin Ervin, Mary Cathleen Keller, and/or Thomas Richard Paige knowing that the defendant did so without permission or lawful authority; in violation of section 18-5-903.5(1),(2) (b), C.R.S.

COUNT FORTY SIX

IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H (Series 3)

On or about January 6, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of Timothy Mackey, Aaron Joel Van Dyke, Ryan Carroll, Stephen Man-Cheuk Chan, Richard Alexander “Alex” Vinton, David McLean Seetch, Brenda Lynn Mueller, Angela Chamberlin, Veryleta Skates, Janice R. Hall-Gade and Dennis Less Gade , Brenda Gail Van Dyke, Nathan Thomas Soto, Chadwick Douglas Moon, Nikolas Levin Ervin, Mary Cathleen Keller, and/or Thomas Richard Paige without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S.

The offenses alleged in Counts Twenty Three through Forty Six were committed in the following manner:

On or about December 15, 2020, two unknown males took a 2017 black Audi S6, tag DAY 165, VIN WAUHFAFC3HN016486, valued at \$44,360 and belonging to Auto Nation Chrysler-Jeep West, located at 16300 W. Colfax Avenue, City of Golden, Jefferson County, State of Colorado, for a test drive. A caller, utilizing the phone number (720) 671-2130 and the name “Timothy” reserved the test drive prior to arrival at the dealership. Notably, this phone number was thereafter associated with Keltner through law enforcement records. Two males arrived at the Auto Nation Chrysler-Jeep West location in a gold sedan. Upon arrival, one male presented an identification and insurance card for “Brian Moss,” as well as a telephone number (720) 377-6204. The males did not return the 2017 black Audi S6 on that date. *See Grand Jury Exhibit 2, Slides 7-8.*

On or about December 18, 2020, a male test drove a 2019 Dodge Challenger, VIN 2C3CDZBT9KH652048, tag DFM548, valued at \$29,629.00 from Skyline Mitsubishi, located at 2040 West 104th Avenue, City of Thornton, Adams County, State of Colorado. At the time of the test drive, the male presented an identification with the name “Jakob Holtzmann” Subsequently, the vehicle was not returned to the dealership. *See Grand Jury Exhibit 2, Slide 9.*

Thereafter, that same date, representatives from Skyline Mitsubishi contacted the male via a phone call. The male stated that he had dropped off the vehicle at 10211 Ura Lane in Adams County with the keys still inside. Skyline employees responded to that location and retrieved the vehicle; however, the dealer’s license plates had been removed from the vehicle at the time of recovery. *See Grand Jury Exhibit 2, Slide 9.*

As described in further detail below, “Jakob Holtzmann” was an identity repeatedly and fraudulently used by Craig Keltner during this time frame. In addition, the telephone number associated with this incident (720-582-7625) is also related to Craig Keltner. This is the same phone number associated with Keltner’s storage unit #2354 at the Public Storage facility located at 6800 West 118th Avenue in Broomfield, City and County of Broomfield, State of Colorado.

See the material facts included in support of Counts 47 through 56, Series Four, set forth below and incorporated by reference herein.

Also on or about December 18, 2020, a male using an identification and an insurance card for “Jakob Holtzmann” test drove 2017 black Audi A4, VIN WAUDNAF40HN042702, valued at \$20,789.00 from Echo Park Automotive, 500 E. 104th Avenue, City of Thornton, Adams County, State of Colorado. Thereafter, the vehicle was not returned to the dealership. *See Grand Jury Exhibit 2, Slide 9.*

On or about January 7, 2021, officers recovered the Echo Park 2017 black Audi A4 near 1723 Robb Street, City of Lakewood, Jefferson County, State of Colorado. At the time of recovery, the vehicle displayed a temporary tag 2678702. Significantly, a copy of this same temporary tag was found inside a stolen, crashed, and abandoned Audi driven by Nathaniel Tsosie on January 6, 2021, as described in further detail below. In addition, the vehicle was processed for any items of evidentiary value. Keltner’s DNA was recovered inside the car. “Jakob Holtzmann” was an identity repeatedly and fraudulently used by Craig Keltner during this time frame, including on this same date at Skyline Mitsubishi. *See Grand Jury Exhibit 2, Slides 10-11, 35-36; Grand Jury Exhibit 3, Slides 5-6.*

On or about January 6, 2021, Robert Moultrie reported his storage unit 4147 at Public Storage, 4370 Youngfield Street in the City of Wheat Ridge, Jefferson County, State of Colorado was found by management to have a tampered lock a few days prior. Upon inspection, Moultrie discovered his unit had been burglarized and \$5,100 worth of tools and property missing, including a Milwaukee drill bit set, fishing gear, computer equipment and a blue and yellow Trek X Caliber 9 mountain bike, with serial number WTU1752488P.

Thereafter, Moultrie’s Ft. Collins Rescue Mission identification and a Milwaukee drill bit set was recovered from a Dodge Charger Hellcat that also contained Keltner’s DNA. See the material facts included in support of Counts 47 through 56, Series Four, set forth below and incorporated by reference herein. Moultrie’s drivers license was also recovered from a Chevrolet Silverado stolen from Adams County by Keltner. See the material facts included in support of Counts 79 through 90, Series Seven, set forth below and incorporated by reference herein.

On or about January 4, 2021, a male using an identification and insurance card for “Jakob Holtzmann” test drove 2019 black Dodge Ram 1500 pickup truck, VIN 1C6SRFHT6KN639268, valued at \$54,754, from Brandon Dodge, located at 5600 South Bannock Street, City of Littleton, Arapahoe County, State of Colorado. Thereafter, the male did not return the truck to the dealership and to date has not been recovered. *See Grand Jury Exhibit 2, Slide 13-14.*

Surveillance footage from inside the dealership at the date and time of the test drive reveals that the suspect’s physical build and appearance was similar to Keltner. “Jakob Holtzmann” was an identity repeatedly and fraudulently used by Craig Keltner during this time frame. The suspect arrived at the dealership with unknown female in black Audi sedan; two black Audi sedans had been stolen recently (the 2017 black Audi S6 from Auto Nation and the 2017 black Audi A4 from Echo Park) and Tsosie also owned one. Keltner was seen driving a similar black Dodge Ram pickup in the City of Lakewood. See the material facts included in

support of Counts 57 through 78, Series Five, set forth below and incorporated by reference herein. *See Grand Jury Exhibit 2, Slides 13-14.*

Sometime between December 29 and December 30, 2020, Michael and Megan Reisinger mailed a \$33,584.18 check made payable to Complete Basement Systems for home remodel from a residential mailbox cluster located at 5276 South Jellison Street, Unincorporated Jefferson County, State of Colorado. The Reisinger's also mailed a letter addressed to The Design Project, LLC, with attention Kim Rodgers at the same date and time from the same location. *See Grand Jury Exhibit 2, Slides 15-17.*

On or about January 4, 2021, a male used a drivers license bearing the name "Timothy Mackey" and Nathaniel Tsosie's photograph to cash the Reisinger's Complete Basement Systems check at a Money Tree located at 2705 South Broadway, City of Englewood, Arapahoe County, State of Colorado. The male arrived at the Money Tree South Broadway location in a black Audi. Further, the male had paperwork from Colorado Secretary of State stating "Timothy Mackey" was an owner of "Complete Basement Systems, LLC." The investigation revealed that Complete Basement Systems is a real business but is not associated with Mackey. "Complete Basements Systems, LLC" is not the legitimate business, and was formed six days prior to January 4, 2021 on the Secretary of State website. *See Grand Jury Exhibit 2, Slides 15-17.*

The male suspect received \$10,000 cash on January 4, 2021 and requested the balance on a Cash App Visa ending 1769 in the name of "Timothy Mackey." This second part of the transaction—on the debit card—did not go through. Thereafter, the suspect received the \$22,578 balance in cash on January 5, 2021 from Money Tree location at 6901 West Alameda Avenue, City of Lakewood, Jefferson County, State of Colorado. *See Grand Jury Exhibit 2, Slides 15-17.*

Surveillance footage from the Money Tree locations reveals that the male suspect was wearing a vest similar to a vest Tsosie wore while impersonating a police officer at the Key Auto dealership on December 5, 2020. *See the material facts included in support of Counts Eleven through Thirteen, Series Two, set forth above and incorporated by reference herein.* The suspect in the Money Tree surveillance footage also has a similar build and physical appearance to Tsosie, including similar ear bores. *See Grand Jury Exhibit 2, Slides 17-18; Grand Jury Exhibit 1, Slide 50.*

In addition, on or about January 6, 2021, Nathaniel Tsosie fled from a crashed black Audi vehicle. Officers recovered the vehicle and processed it for any items of evidentiary value. Officers located Tsosie's DNA on Money Tree envelopes recovered from that vehicle. Officers also located an envelope addressed to The Design Project, LLC, torn and empty, other mail from the Reisinger's neighborhood, the Colorado Secretary of State paperwork for Complete Basement Systems referencing Timothy Mackey, \$21,019 in cash or U.S. currency, multiple identity documents with Mackey's name and Tsosie's photograph, including a Colorado drivers license, and multiple financial documents referencing Mackey in the vehicle. *See the material facts, set forth below and incorporated by reference herein.* In addition, Colorado Secretary of State paperwork for the fraudulent Complete Basement Systems entity was also located during a search of a storage unit rented by Marti Davis on February 17, 2021. *See Counts 57 through 78, Series Five, below, incorporated by reference.*

Officers conducted further investigation regarding the Cash App Visa card ending 1769 that Tsosie had attempted to receive funds on at the Englewood Money Tree location on January 4, 2021. A review of the records for this Visa card revealed that it was also used to pay the fees to set up the fraudulent Complete Basement Systems LLC with the Secretary of State. The card was also used to transfer funds to Justin Jameson and Craig Keltner, and receive funds from Jameson and Marti Davis. The card was used to make payments to the Public Storage facility at 4370 Youngfield Street, City of Wheat Ridge, Jefferson County, State of Colorado, where Robert Moultrie also has a storage unit. Timothy Mackey did not apply for or authorize the opening of this card/account. *See* Grand Jury Exhibit 2, Slide 21.

One of the addresses associated with this card—448 South Depew Street, City of Lakewood, Jefferson County, State of Colorado—was associated with both Tsosie and Dustin James. Phone numbers listed for this account were 720-671-2130, which was previously associated with Keltner, and 970-355-9819, which was used to set up an account in Gary Sisti's name at Public Storage. *See* Grand Jury Exhibit 2, Slide 21, 92. Records also revealed a Visa Chime debit card ending 1301 was added as a linked financial instrument to the Cash App card ending in 1769. *See* Grand Jury Exhibit 2, Slide 21, 84. This secondary Chime Visa Card, as well as a fraudulent drivers license with Timothy Mackey's name and Tsosie's photo, was subsequently located in a stolen Dodge Durango driven by Tsosie. *See* the material facts included in support of Counts 57 through 78, Series Five, set forth below and incorporated by reference herein.

Investigators subsequently confirmed that Timothy Mackey had not given any individual permission to use his identification or financial information for any purpose. In addition to the fraudulent uses of his identification and name outlined above, the investigation in this matter confirmed that Timothy Mackey's identify had been used in an unauthorized manner to rent a storage unit at Extra Space Storage, 197 Inverness Drive West, Arapahoe County, State of Colorado. *See* Grand Jury Exhibit 2, Slide 24. As set forth above in Counts 11 through 22, Series Two, Tsosie had previously been identified as present at this location in November 2020.

On or about January 6, 2021, Arvada Police Department officers located the Auto Nation 2017 black Audi S6, driven by Nathaniel Tsosie. On that date, officers were called to conduct a welfare check on the Auto Nation 2017 black Audi S6 at the 7-11 located at the 5490 Wadsworth Bypass, City of Arvada, Jefferson County, State of Colorado, around 4:52 a.m. Upon arrival, officers located the Auto Nation 2017 black Audi parked and running at the gas pumps, with a single male occupant asleep in the vehicle. The male was described as bald and having a beard. *See* Grand Jury Exhibit 2, Slide 25.

Arvada Police Department Officers T. Wees and R. Freeman, who both responded in marked patrol vehicles, attempted to contact the vehicle, by blocking the vehicle's direction of travel. The male occupant awoke and initially appeared as if he would comply with the officers' attempt to contact him and the vehicle. However, the male driver then attempted to drive away, almost colliding with Officer Freeman's vehicle. Officers Wees and Freeman activated the emergency lights on their marked patrol vehicles and initially followed the Auto Nation 2017 black Audi S6. The Audi drove around the officers' patrol vehicles, drove over an island curb,

and collided with a concrete barrier light pole on the drivers side. The Auto Nation 2017 black Audi then drove over multiple island curbs, and proceeded Southbound in the Northbound lanes of Colorado State Highway 121. Officers Wees and Freeman terminated their pursuit but continued to monitor any sightings of the vehicle. Ultimately, the vehicle crashed near the 5630 Wadsworth Bypass in Jefferson County, and the sole male occupant abandoned the vehicle on foot. At its resting point, the vehicle had collided with a metal and concrete culvert, and was disabled and inoperable at the time of recovery. *See Grand Jury Exhibit 2, Slide 25.* The vehicle was leaking fluids and smoking, and parts from the vehicle were scattered in the area.

Upon recovery, officers located a canine in the vehicle, later identified as Tsosie's canine, Theo. Officers also processed the vehicle for any items of evidentiary value. Officers located a zippered bag with a lock, and a key for same on a key ring inside the vehicle. Once opened, the zippered bag contained 220.31 g of suspected methamphetamine, and 10.05 g of suspected fentanyl (in pill form). Officers also located a black and silver backpack on the passenger seat of the Audi, containing 24 small black baggies, 3 x 4 inch plastic baggies, and a small scale. In addition, officers retrieved an Anderson Arms AR-15 rifle, Serial No. NO5538F14, and magazines and ammunition. On January 6, 2021, Tsosie had previously been convicted of a felony offense, namely—on or about October 24, 2012, in Boulder County Colorado District Court Case Number 2012CR480, Tsosie had been convicted of Second Degree Burglary, a class four felony, pursuant to C.R.S. § 18-4-203(1). *See Grand Jury Exhibit 2, Slide 26.*

During the incident, Officer Freeman had a clear view of the driver of the Audi as he approached and attempted to contact the vehicle. During the search of the AutoNation Audi, officers located an identification with Timothy Mackey's name and a photo for an individual later determined to be Nathaniel Tsosie. The officers researched Timothy Mackey and located a drivers license photo that was not consistent with the driver of the Audi they had just attempted to contact; however, they did recognize the photo on the identification as that driver. Other paperwork recovered from the vehicle referenced Tsosie and in researching a known photograph of Tsosie, the responding officers were ultimately able to positively identify Tsosie as the driver of the Audi they had just attempted to contact. Officers also recovered Money Tree envelopes from inside the Audi that confirmed the presence of Tsosie's DNA. *See Grand Jury Exhibit 2, Slide 27.*

Officers also recovered from the vehicle personal identifying information and financial information of the following individuals: Timothy Mackey (multiple fraudulent identifications with Mackey's name and others' photographs), Aaron Joel Van Dyke (printed checks), Ryan Carroll (information including social security number included on a list), Stephen Man-Cheuk Chan (checks), Richard Alexander "Alex" Vinton (checks), David McLean Seetch (checks), Brenda Lynn Meuller (checks), Angela Chamberlin (checks), Veryleta Skates (checks), Janice R. Hall-Gade and Dennis Less Gade (checks), Brenda Gail Van Dyke (paperwork with name), Nathan Thomas Soto (drivers license), Chadwick Douglas Moon (drivers license) Nikolas Levin Ervin (drivers license), Mary Cathleen Keller (drivers license), and Thomas Richard Paige (instruction permit). *See Grand Jury Exhibit 2, Slides 22-23; 28-29.* Officers also recovered a printed list of names, dates of birth, social security numbers, phone numbers and email addresses for multiple victims. *See Grand Jury Exhibit 2, Slide 30.*

Officers also recovered from the vehicle correspondence associated with Riley Fisher and Marti Davis. *See* Grand Jury Exhibit 2, Slide 27. On the Samsung tablet recovered from the Auto Nation Audi, officers located a video that appeared to depict footage of Tsosie engaged in scouting vehicles by license plate number. *See* Grand Jury Exhibit 2, Slide 32. A cell phone recovered from the vehicle also appeared to contain text messages between Tsosie and Marti Davis. *See* Grand Jury Exhibit 2, Slide 33. Following the crash and abandonment of the vehicle, Davis attempted to retrieve Tsosie’s canine from an animal shelter. She was successful in taking custody of Theo on January 9, 2021 after she presented a purported notarized document from Tsosie. *See* Grand Jury Exhibit 2, Slide 34.

COUNT FORTY SEVEN

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 4)**

Between and including January 11, 2021 to February 5, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Johnson Auto Plaza, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT FORTY EIGHT

**IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-
902(1) (A) [F4] 1307G
(Series 4)**

Between and including January 11, 2021 to February 5, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Jakob Holtzmann without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FORTY NINE

**CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 4)**

Between and including January 11, 2021 to February 5, 2021, in the State of Colorado **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Jakob Holtzmann, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT FIFTY
SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 4)

On or about January 12, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Dean Bruning, Jean Conroy, and/or Public Storage, located at 6800 W. 118th Avenue, City and County of Broomfield, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT FIFTY ONE
THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
(Series 4)

On or about January 12, 2021, in the State of Colorado, **Craig Keltner** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: tools, clothing, backpacking gear, scuba diving gear, a portable generator, coins, and other miscellaneous personal property, of Dean Bruning and Jean Conroy, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Dean Bruning and Jean Conroy permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(d), C.R.S.

COUNT FIFTY TWO
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 4)

Between and including January 21, 2021 to January 30, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Auto Nation Dodge Ram, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT FIFTY THREE
IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-
902(1) (A) [F4] 1307G
(Series 4)

On or about January 23, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Cynthia Kuper without permission or lawful authority with

the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT FIFTY FOUR

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 4)

On or about January 23, 2021, in the State of Colorado **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Cynthia Kuper, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT FIFTY FIVE

SECOND DEGREE CRIMINAL TRESPASS - ENCLOSED/FENCED AREA, C.R.S. 18-4-503(1) (A) [M3] 09036
(Series 4)

On or about January 23, 2021, in the State of Colorado **Craig Keltner** unlawfully entered or remained in or upon the premises of Public Storage, located at 6800 West 118th Avenue, City and County of Broomfield, which were enclosed in a manner designed to exclude intruders or were fenced; in violation of section 18-4-503(1)(a), C.R.S.

COUNT FIFTY SIX

CRIMINAL MISCHIEF - UNDER \$300, C.R.S. 18-4-501(1),(4)(A) [M3] 0901F
(Series 4)

On or about January 23, 2021, in the State of Colorado **Craig Keltner**, in the course of a single criminal episode, unlawfully and knowingly damaged the real or personal property of Public Storage, 6800 West 118th Avenue, City and County of Broomfield, the aggregate damage being less than three hundred dollars; in violation of section 18-4-501(1),4(a), C.R.S.

The offenses alleged in Counts Forty Seven through Fifty Six were committed in the following manner:

On or about January 11, 2021, a male using the identity “Jakob Holtzmann” and phone number 303-332-2417, test drove 2016 red Dodge Charger Hellcat with a black hood, VIN 2C3CDZC93GH299431, valued at \$48,496, from Johnson Auto Plaza, located at 12410 East 136th Avenue, City of Brighton, Adams County. The vehicle was not returned to the dealership. As set forth in Series Three, Counts 23 through 46 above and incorporated herein, Craig Keltner repeatedly used the identity “Jakob Holtzmann” to secure tests drives of vehicles that were subsequently not returned to the dealership and stolen in this same time frame. Notably, Keltner’s DNA was recovered from one of those vehicles. *See e.g.* Counts 27 through 29, above. *See also* Grand Jury Exhibit 2, Slide 38-39.

On or about January 12, 2021, burglaries were reported at Public Storage Self Storage, 6800 West 118th Avenue, City and County of Broomfield, State of Colorado, by storage unit

tenant Dean Bruning (unit #2009) and storage unit tenant Jean Conroy (unit #2011). Bruning identified items taken from unit #2009 as including: a Craftsman multi-drawer toolboxes, a DeWalt drill, miscellaneous tools, coats, and backpacking gear, with a total value of \$9,629. Conroy identified items taken from unit #2011 as including: scuba gear, a Champion portable generator, U.S. Mint coins, miscellaneous tools and power tools, with a total value of \$2,681. *See also* Grand Jury Exhibit 2, Slide 40-41.

Surveillance video from Public Storage showed two males and a female enter the facility using the access code for unit #2354, rented by Craig Keltner. The phone number associated with the account for this storage unit was 720-582-7625. The investigation revealed that this was the same number listed for the male test driving the Dodge Challenger from Skyline Mitsubishi as Jakob Holtzmann in the City of Thornton on or about December 20, 2020. *See* Series Three, Counts 23 through 46, above, incorporated by reference herein. The suspects also appeared to arrive in red or orange Dodge Charger w/black hood similar in appearance to the vehicle stolen from Johnson Auto Plaza one day prior, and a black pickup truck. *See also* Grand Jury Exhibit 2, Slide 40-41.

On or about January 21, 2021, a white male, using the name “Jakob Holtzmann,” and the phone number 720-884-7019, test drove a 2017 black Dodge Challenger, VIN 2C3CDZGG6HH641111, valued at \$26,999 from Auto Nation Dodge-Ram, located at 10743 East Arapahoe Road, City of Centennial, Arapahoe County, State of Colorado. The male did not return the vehicle following the test drive. *See* Grand Jury Exhibit 2, Slide 42. Officers located and interviewed the real Jakob Holtzmann, who reported that his identification had previously been stolen during a burglary in Aurora in 2020.

On or about January 23, 2021, three suspects entered the Public Storage, located at 6800 West 118th Avenue, City and County of Broomfield. The suspects used the facility access code for unit #2203, rented by a “Cynthia Kuper.” The suspects arrived at the storage facility in a black pickup truck similar to that previously observed at the same location on January 12, 2021 described above. The suspects attempted to cut a lock placed on Keltner’s storage unit #2354, where an eviction notice had been posted and the lock changed by manager. The suspects damaged the lock and hasp valued at \$40, but left without taking any property. Previous burglary victim and storage facility tenant Dean Bruning was checking his unit at this time, smelled an odor like burning metal, and reported the activity to manager, who in turn called law enforcement. Officers located and contacted Cynthia Kuper who stated that she lost her identification, did not open this account, or give anyone permission to do so. *See* Grand Jury Exhibit 2, Slide 43.

Officers recovered the Auto Nation Dodge-Ram 2017 Dodge Challenger on or about January 30, 2021 near I-25 on the overpass at West 144th Avenue, Adams County. At the time of recovery, the vehicle displayed license plate CSL 371. This license plate had previously been reported stolen out of the City of Broomfield on or about January 23, 2021. *See* Grand Jury Exhibit 2, Slide 42.

On or about February 5, 2021, Thornton Police Officers recovered the Johnson Auto Plaza 2016 Dodge Hellcat at the Candlewood Suites hotel located at 14362 Lincoln Way, City of

Thornton, Adams County, State of Colorado. At the time of recovery, the vehicle appeared to have been spray painted black. Officers located cans of spray paint inside the vehicle. *See also* Grand Jury Exhibit 2, Slide 38-39.

Additional items located in the vehicle connected to multiple previous storage unit burglaries. Officers located Milwaukee brand tools including a drill bit set and gloves, DeWalt tools, coins, keys, Huskey tools, U.S. Mint coins, football cards, Tough System tools, Wagner tools, and other miscellaneous tools that were consistent with items reported stolen earlier in January, 2021 from the Broomfield storage unit facility located on West 118th Avenue, described immediately above in this same series. Officers also recovered Robert Moultrie's Ft. Collins Rescue Mission identification card and a Milwaukee drill bit set belonging to Moultrie stolen from his storage unit in Wheatridge between December 2020 and January 2021, described in Series Three above. A jacket similar in color and style as to the one worn by one of the male suspects in the storage unit burglaries at West 120th Avenue between February 2, 2021 and February 3, 2021 was also recovered. Finally, officers recovered Keltner's DNA from a set of Milwaukee gloves located inside the car. *See also* Grand Jury Exhibit 2, Slide 64-69.

Officers also recovered a Chick-Fil-A receipt from inside the vehicle for a transaction earlier on February 5, 2021 at a store located at 14275 Orchard Parkway, City of Westminster. Significantly, this location is just a few minutes drive from the Candlewood Suites where the vehicle was ultimately recovered. Officers obtained video surveillance from the restaurant drive thru for this transaction time. The video depicts a male driver with arm tattoos consistent with Craig Keltner. *See also* Grand Jury Exhibit 2, Slide 64-69.

Officers also obtained the surveillance footage from the Candlewood Suites hotel for February 5, 2021. The video captured the arrival of the Johnson Auto Plaza stolen vehicle shortly after it passed through the restaurant drive through. That surveillance video showed a male entering the hotel shortly after the arrival of the stolen vehicle consistent in physical build, appearance, and dress to Keltner, and some consistencies with the male depicted in the restaurant drive through footage driving the vehicle. *See also* Grand Jury Exhibit 2, Slide 70-71.

COUNT FIFTY SEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 5)

Between and including January 27, 2021 to February 4, 2021, in the State of Colorado, **Justin Jameson** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Veronica Chesnokov, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or used the motor vehicle in the commission of the crime of Aggravated Motor Vehicle Theft as set forth in section 18-4-409, C.R.S., and/or and caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT FIFTY EIGHT

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H**

(Series 5)

Between and including January 28, 2021 to February 15, 2021, in the State of Colorado, **Justin Jameson** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Interstate Ford, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, , and/or and attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT FIFTY NINE

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G

(Series 5)

On or about January 28, 2021, in the State of Colorado, **Justin Jameson** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Alexander Collins without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIXTY

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F

(Series 5)

On or about January 28, 2021, in the State of Colorado **Justin Jameson** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Alexander Collins, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SIXTY ONE

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H**

(Series 5)

Between and including January 28, 2021 to February 12, 2021, in the State of Colorado, **Nathaniel Tsosie** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of CarMax, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT SIXTY TWO

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 5)

Between and including January 28, 2021 and February 10, 2021, in the State of Colorado, **Nathaniel Tsosie** and **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Noah Lewton without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIXTY THREE

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 5)

Between and including January 28, 2021 and February 10, 2021, in the State of Colorado **Nathaniel Tsosie** and **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Noah Lewton, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SIXTY FOUR

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 5)

On or about February 1, 2021, in the State of Colorado, **Nathaniel Tsosie** and **Craig Keltner** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Taylor and Zach Nagelvoort, Ally and Justin Henderson, Victoria Riveria and Gabriel Rodriguez, and/or Extra Space Storage, 2555 South Lewis Way, City of Lakewood, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT SIXTY FIVE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(g) [F5] 08A14
(Series 5)

On or about February 1, 2021, in the State of Colorado, **Nathaniel Tsosie** and **Craig Keltner** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: kitchen items, tools, bar sets, household appliances, boating equipment, jewelry, dolls, electronics, a television, personal documents, and other miscellaneous personal property, of Taylor and Zach Nagelvoort,

Ally and Justin Henderson, Victoria Riveria and Gabriel Rodriguez, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Taylor and Zach Nagelvoort, Ally and Justin Henderson, Victoria Riveria and Gabriel Rodriguez permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g), C.R.S.

COUNT SIXTY SIX

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 5)

Between and including February 1, 2021 to February 2, 2021, in the State of Colorado, **Nathaniel Tsoie** and **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Courtney Cox without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SIXTY SEVEN

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 5)

Between and including February 1, 2021 to February 2, 2021, in the State of Colorado **Nathaniel Tsoie** and **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Courtney Cox, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SIXTY EIGHT

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] 41105
(Series 5)

On or about February 1, 2021, in the State of Colorado, **Craig Keltner** a customer of Fast Cash, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his identity and/or ownership for a purchase transaction or contract for purchase of tangible personal property, namely: a television; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT SIXTY NINE

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 5)

On or about February 1, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Jakob Holtzmann without permission or lawful authority with

the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SEVENTY

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 5)

On or about February 1, 2021, in the State of Colorado **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Jakob Holtzmann, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT SEVENTY ONE

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
(Series 5)

Between and including February 2, 2021 to February 3, 2021, in the State of Colorado, **Nathaniel Tsosie, Craig Keltner, Justin Jameson, and Andrea Wettig** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Todd Holtgrewe, Timothy Burmeister, Christopher Harkins, Eduardo Rodriguez, and/or Extra Space Storage, 5602 W. 120th Avenue, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT SEVENTY TWO

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A15
(Series 5)

Between and including February 2, 2021 to February 3, 2021, in the State of Colorado, **Nathaniel Tsosie, Craig Keltner, Justin Jameson, and Andrea Wettig** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: tools, collectibles, financial documents, identification cards, firearms, electronics, compressors, clothing, and other miscellaneous personal property, of Todd Holtgrewe, Timothy Burmeister, Christopher Harkins, and Eduardo Rodriguez with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Todd Holtgrewe, Timothy Burmeister, Christopher Harkins, Eduardo Rodriguez permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(h), C.R.S.

COUNT SEVENTY THREE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 5)

Between and including February 5, 2021 to February 9, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Fowler Automotive Honda, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT SEVENTY FOUR

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 5)

Between and including February 10, 2021 to February 17, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Christopher Dodge World, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT SEVENTY FIVE

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031

(Series 5)

Between and including January 1, 2021 to February 17, 2021, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Everett Scovell, and/or Public Storage, 5788 6th Avenue, City of Lakewood, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT SEVENTY SIX

THEFT - \$300 - \$750, C.R.S. 18-4-401(1),(2)(D) [M2] 08A11

(Series 5)

Between and including January 1, 2021 to February 17, 2021, in the State of Colorado, **Nathaniel Tsoie** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a crossbow, paperwork, and other miscellaneous personal property, of Everett Scovell with the value of three hundred dollars or more but less than seven hundred and fifty dollars, and intended

to deprive Everett Scovell permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(d), C.R.S.

COUNT SEVENTY SEVEN

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 5)

Between and including December 1, 2020 and February 15, 2021, in the State of Colorado, **Nathaniel Tsoie** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Gary Sisti without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT SEVENTY EIGHT

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 5)

Between and including December 1, 2020 and February 15, 2021, in the State of Colorado **Nathaniel Tsoie** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Gary Sisti, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The offenses alleged in Counts Fifty Seven through Seventy Eight were committed in the following manner:

On or about January 27, 2021 Veronica Chesnokov's 2019 white Ford Fusion, Colorado license plate BVW E21, VIN 3FA6P0D90KRI06844, valued at \$20,000 was stolen from 5752 Xenon Way, unincorporated Jefferson County. *See* Grand Jury Exhibit 2, Slide 44.

The following day, on or about January 28, 2021, a male arrived in Ms. Chesnokov's vehicle at Interstate Ford, located at 120 Laura Court, Dacono, Weld County. Ms. Chesnokov's vehicle still displayed the license plate BVW E21. A male presented a drivers license for "Alexander Collins" to test drive a 2017 blue Audi S3, VIN WAUB1GFF2H1038603, valued at \$35,850. The Interstate Ford 2017 Audi was not returned on that date. *See* Grand Jury Exhibit 2, Slide 45-46.

Also on or about January 28, 2021, CarMax, located at 16500 West. Colfax Avenue, Golden, Jefferson County, received an online request for at test drive from "Noah Lewton." Thereafter, a male arrived in a Dodge Challenger Hellcat (unknown color) with a female, who stayed in the Hellcat. The male provided an identification in Lewton's name and phone 720-884-7019 to test drive a 2020 silver Dodge Durango, VIN 1C4SDJCT7LC229240 valued at \$41,900, which subsequently was not returned. Investigators located and contacted the real Noah Lewton; Lewton reported that he lost his wallet while riding a bus earlier in January 2021.

See Grand Jury Exhibit 2, Slide 47. Notably, this same phone number had been used a week prior to secure a test drive with the purpose of stealing a motor vehicle from the Auto Nation Dodge-Ram in Arapahoe County under the name “Jakob Holtzmann.” *See* Series Three above, Counts 23 through 46. *See also* Grand Jury Exhibit 2, Slide 42.

On or about February 1, 2021, two males used a newly created storage unit account under the name “Courtney Cox” and associated with the phone number 720-884-7019, and entered Extra Space Storage Unit, 2555 South Lewis Way, City of Lakewood, Jefferson County. Surveillance video showed the suspects arriving in two vehicles: a black Dodge pickup and a silver Dodge Durango—resembling the vehicles stolen days prior from Brandon Dodge and CarMax. (Initially, the video showed a partial license plate on the Durango possibly ending in 007; however, the correct ending digits were later determined to be D07.) The driver of the silver Dodge Durango wore a bright yellow traffic style vest. Surveillance video showed the males walking in and out of the facility with tote bins, and ultimately captured them leaving with suitcase and a large TV, and using a tarp to cover the truck bed. *See also* Grand Jury Exhibit 2, Slide 49. Notably, the phone number associated with this newly created storage unit account was consistent with the phone number used for the test drives at CarMax and Auto-Nation Dodge Ram.

Multiple tenants reported burglaries and thefts from their units consistent with this date. Taylor and Zach Nagelvoort, who rented Unit 2143, reported \$2,000 worth of kitchen items, tools, bar sets, and vacuums as stolen. Ally and Justin Henderson, who rented Unit 2077, reported \$1,950 worth of boating equipment, jewelry, dolls, and electronics as stolen. Victoria and Gabriel Rodriguez, who rented Unit 2144, reported \$1,535 worth of property, to include a large flat screen TV, a Houston Texans hat collection, and personal identity documents for Rodriguez as stolen. A lock from one of the victim’s units confirmed the presence of Tsosie’s DNA. In addition, items belonging to these victims were subsequently recovered from a storage unit rented by Tsosie in Jefferson County. *See also* Grand Jury Exhibit 2, Slide 49-50.

Later than same date, on or about February 1, 2021, a white male arrived in a black Dodge Ram with a tarp covering the truck bed at the Fast Cash pawn shop, 1023 Federal Boulevard, in the City and County of Denver. The male removed a large TV from truck bed, entered the shop with the television and left without it. During the transaction, the male identified himself as “Jakob Holtzmann.” The television was subsequently identified as that belonging to Victoria Rivera and Gabriel Rodriguez and taken from their storage unit. Video surveillance from the pawn shop shows the male suspect had similar physical build, appearance, and dress to Craig Keltner as observed at other points in the investigation. *See also* Grand Jury Exhibit 2, Slide 52-53.

On or about February 2, 2021, Courtney Cox’s name was again used to apply for account at Extra Space Storage, 5602 West 120th Avenue, Jefferson County. The facility also received a phone call from 720-884-7019 consistent with this time frame. This phone number has previously been associated with the theft of vehicles at CarMax, Auto Nation-Dodge Ram, and the fraudulent Courtney Cox storage unit account at the Extra Space Storage on South Lewis Way. *See also* Grand Jury Exhibit 2, Slide 54.

That evening, facility surveillance footage captured a black pickup following another tenant into the property. A male with black jacket over blue jacket and female with long brown hair leave truck on foot; they resembled Keltner and Wettig. They returned to truck with dollies loaded with tools, suitcases, a blue storage tub, rolling cabinets, a ladder, and other items. A jacket similar to the one worn by the male was subsequently recovered from the 2016 Dodge Charger Hellcat stolen from Johnson Auto Plaza. *See also* Grand Jury Exhibit 2, Slide 54-57.

On or about February 3, 2021, surveillance video captured four males returning to the facility and entering with a universal access code. Significantly, the suspects returned in a black pick up truck, a silver Dodge Durango, and a white Audi. One male appeared to be same male seen on surveillance video from the day prior, and one male appeared consistent in physical build, appearance, and dress with Nathaniel Tsosie. *See also* Grand Jury Exhibit 2, Slide 58-61.

Multiple tenants reported burglaries and thefts from their units consistent with this date. Todd Holtgrewe, who rented Unit 1213, reported \$1,211 worth of tools, a Matchbox car collection, financial documents, and a passport as stolen, as well as lock valued at \$25 broken. Timothy Burmeister, who rented Unit 1218, reported miscellaneous papers, including possibly his social security card, as stolen as well as a lock valued at \$15 broken. Sally and Christopher Harkins, who rented Unit 1231, reported \$25,000-30,000 worth of guns and electronics as stolen. Eduardo Rodriguez, who rented Unit 1217, reported \$5,300 worth of tools, air compressors, cowboy boots as stolen. *See also* Grand Jury Exhibit 2, Slide 62.

On or about February 3, 2021, the owner of Glacier Park Storage, 3759 Imperial Street, Frederick, observed Nathaniel Tsosie driving a silver Dodge Durango, with a license plate BHR-D07. *See also* Grand Jury Exhibit 2, Slide 63.

On or about February 4, 2021, Ms. Chesnokov's vehicle was recovered near 10760 W. Hampden Frontage Road South, City of Lakewood, Jefferson County, with over \$18,000 in damage. *See* Grand Jury Exhibit 2, Slide 44.

On February 5, 2021, officers recovered the Johnson Auto Plaza Dodge Charger Hellcat associated with Keltner, as described above in Series Four, Counts 47 through 56, above.

On or about February 5, 2021, a male using the name "Noah Lewton" and phone number 720-626-7865 test drove a white 2017 Honda Civic Type R, tag BNHK14, VIN SHHFK8G77HU202609, valued at \$35,909, from Fowler Automotive Honda, 710 South Main Street, City of Longmont, Boulder County. The vehicle was not returned. *See* Grand Jury Exhibit 2, Slide 72.

On or about February 9, 2021, the Fowler Automotive Honda was recovered and towed away by Arvada Police from 6807 Olde Wadsworth, Jefferson County. Unit 210 at this location is a location where Keltner is known to have stayed. Notably, Keltner complained to the manager that his brand-new Civic Type R had been towed. At the time of the recovery, the Fowler Automotive Honda displayed a License plate that belonged to a different 2017 white Honda sedan. In addition, a license plate for a 2015 black Audi S3 owned by Peter Bailey was found in the car. A pink suitcase similar to one taken from Extra Space Storage on West 120th

Avenue in Jefferson County on or about February 2, 2021. *See* Grand Jury Exhibit 2, Slide 54-55; 72-73. Finally, Keltner’s DNA was recovered from the steering wheel of this vehicle.

On or about February 10, 2021, a male using drivers license and insurance card for “Noah Lewton,” and phone number 720-884-7019, test drove a 2020 black Dodge Challenger, tag BJYC17, VIN 2C3CDZFJ3LH210067, valued at \$21,525, from Christopher Dodge World, located at 16655 West Colfax Avenue, Golden, Jefferson County. The male arrived in a black Dodge Ram truck with a woman passenger, and the vehicle was not returned following the test drive. Significantly, this phone number has previously been associated with the theft of vehicles at CarMax, Auto Nation-Dodge Ram, and the fraudulent Courtney Cox storage unit account at the Extra Space Storage on South Lewis Way.

On or about February 11, 2021, Arvada Police Department officers located Nathaniel Tsosie using a phone track. They surveilled Tsosie at a storage facility and attempted to contact him, but he drove away at a high rate of speed in a silver Dodge Durango bearing the license plate BHR DO7. *See* Grand Jury Exhibit 2, Slide 76-77.

On or about February 12, 2021, officers continued to track Tsosie’s phone and located him near Casper, Wyoming. Wyoming law enforcement located Tsosie in a silver Dodge Durango near Kaycee, Wyoming. They attempted to contact Tsosie at that time, but Tsosie failed to stop for the officers and a police chase ensued, involving speeds in excess of ninety miles per hour. Officers lost sight of the vehicle at that time. *See* Grand Jury Exhibit 2, Slide 78-83.

Later on that same date, the silver Dodge Durango was again located near Sheridan, Wyoming. Again, police pursued the vehicle. Stop sticks were deployed and damaged the tires of the vehicle. Officers used a tactical intervention with their own vehicles to terminate the pursuit. Officers thereafter determined the occupants of the silver Durango—identified as the vehicle previously stolen from CarMax—as Tsosie and his canine, Theo. *See* Grand Jury Exhibit 2, Slide 78-83.

Officers processed the silver Dodge Durango and found property connected to prior storage unit burglaries. Officers identified a cell phone belonging to Justin Henderson, and stolen from his storage unit at a facility on South Lewis Way in Jefferson County on or about February 1, 2021, described immediately above in this same series. Officers also recovered a pistol belonging to Christopher Harkins and stolen from his storage unit on West 120th Avenue in Jefferson County between February 2, 2021 and February 3, 2021. Officers recovered actual and forged driver’s licenses in various states of production, some with victim names but faces of Tsosie and/or his associates, including but not limited to for victims Timothy Mackey, Alexander Collins, Courtney Cox, Aaron Joel Van Dyke, Steven Chan, Nathaniel Fishel, Donny Stewart, Christopher Harkins, Derek Huffman, Joshua Shorts, Joshua Lybarger. Officers also recovered financial documents related to numerous victims including but not limited to: Ryan Carrol, Timothy Mackey, Mary “Elizabeth” Vinton, and Justin and Mria Gamble. The Gamble’s storage unit on Marshall Court in the Jefferson County had previously been burglarized sometime in November through December, 2020. Finally, officers recovered a receipt for a firearm belonging

to Everett Scovell. Mr. Scovell also had property stolen from storage unit in Jefferson County during this time frame, described below. *See Grand Jury Exhibit 2, Slide 78-83.*

Officers also recovered a Visa Chime debit card from the Durango, card ending in 1301. Subsequent investigation revealed that this debit card was opened in Timothy Mackey's name without his permission. The address on the account listed as 448 South Depew Street in Lakewood, Jefferson County, which was previously associated with Nathaniel Tsosie in August of 2020, as well as Dustin James. The phone number listed was 720-671-2130, which was previously associated with Keltner in September of 2020. *See Grand Jury Exhibit 2, Slide 84.*

The transaction history of this card revealed that it was used to pay fees for the storage unit rented under Timothy Mackey's name without his permission. There were multiple transactions made on this card consistent with storage unit rentals, as well as web based research services that might be utilized when fabricating identities, *e.g.* services that generate phone numbers, preform background checks, or locate foreclosed properties. There were transfers from this account to other cards/accounts, including "Card to Card to Nathaniel Tsosie." This card was added as a linked financial instrument to the Cash App card ending in 1769 that Tsosie used at the Money Tree locations between December 29, 2019 and January 4, 2021 to receive funds from the "Complete Basement Systems" check stolen from Michael and Megan Reisinger, set forth above in Series Three. *See Grand Jury Exhibit 2, Slide 84.*

On or about February 14, 2021, Tsosie called Justin Jameson while in the custody of the Johnson County Jail in Wyoming. Tsosie requested that Jameson retrieve Theo and "retrace his travel." Tsosie referred to Jameson as his "brother" during this conversation. Tsosie stated that he had his rifle and shotgun with him and all of his firearms had been confiscated. Jameson agreed to place money on Tsosie's inmate account, and referenced he and "CJ" being able to bond Tsosie out. *See Grand Jury Exhibit 3, Slide 21.*

On or about February 15, 2021, Jameson arrived at an animal shelter in Buffalo, Wyoming to retrieve Theo, Tsosie's canine. Jameson arrived there in the Interstate Ford 2017 Audi S3 and was apprehended. At the time of recovery, the Interstate Ford 2017 Audi—previously blue—had been painted white. Officers also noted a decal on the front end that was consistent with a decal observed on a white Audi arriving at the West 120th Avenue storage unit facility on February 3, 2021, described immediately above in this series. *See Grand Jury Exhibit 2, Slide 87-90.*

Officers recovered several relevant items from the Interstate Ford Audi, including cans of white spray paint, several Colorado license plates, and an insurance card for another Audi vehicle owned by Jameson. A paper drivers license with Jameson's photo in name of Alexander Collins, and a GEICO insurance card for Collins were found inside. *See Grand Jury Exhibit 2, Slide 87-90.*

Following his arrest, Jameson phoned Brittany Nickell on or about February 24, 2021. Nickell accused Jameson of leaving her to be with "Nate," and described "CJ" as a "weirdo." Jameson responded that "CJ" was "actually really good if you needed something," and mentioned that "CJ" owed him a car. Nickell and Jameson discussed getting rid of a Ford, and

needing to be careful because the vehicle likely had tracking devices. Nickell confirmed that the vehicle was gone. *See Grand Jury Exhibit 3, Slide 23.*

On or about February 15, 2021, employees of Public Storage, 850 Simms Street, City of Lakewood, Jefferson County, discovered that Gary Sisti's name and address had been used to create an account for a rental unit at that facility between December 10, 2020 and January 31, 2020. The real Gary Sisti confirmed that he had not rented that storage unit, and denied any use of the phone numbers and/or email addresses listed for the rental account. The phone number used to establish the fraudulent Gary Sisti rental unit was also listed as an associated phone number on the Cash App Visa debit card ending 1769. *See Grand Jury Exhibit 2, Slides 21, 91.*

On or about February 17, 2021, Westminster Police Department officers recovered the Christopher Dodge World 2020 black Dodge Challenger at 7003 Winona Court, in Adams County. At the time of recovery, the vehicle did not have any license plates displayed. Keltner also used the identification of Noah Lewton to test drive and subsequently steal a Honda Civic Type R from Fowler Automotive Honda during this same time period, described immediately above in this series. A drivers license for Noah Lewton was recovered also from a Chevrolet Silverado stolen from Adams County by Keltner and crashed by Andrea Wettig after eluding in March 2021. *See Series Seven, Counts 79 through 90, described below, and incorporated by reference herein.*

On or about February 17, 2021, Everett Scovell reported a theft of his property from a storage unit rented by his mother at Public Storage, 5788 6th Avenue, City of Lakewood, Jefferson County. Scovell reported that approximately \$500 worth of property was taken, including a crossbow. Scovell had originally discovered the theft sometime in January 2021, but had not immediately reported the loss. Scovell's crossbow was later located in a storage unit belonging to Tsosie in Jefferson County. In addition, a receipt for a firearm owned by Scovell was found in the CarMax silver Durango at the time it was recovered in Wyoming, described immediately above in this series. *See Grand Jury Exhibit 2, Slide 92.*

On or about February 17, 2021, officers executed a search warrant at a storage unit #K020, located at Security Self Storage, 9750 West Jewell Avenue, City of Lakewood, Jefferson County rented by Marti Davis. From that unit, officers recovered a drivers license with Tsosie's photo and Alexander Vinton's name, and paperwork related to victims Keohane (storage unit on Inverness Drive burglarized between November through December 2020), Mackey (identity used for fraudulent storage unit rentals and in furtherance of cashing stolen checks), and Webb (name used for a test drive and theft from the Key Auto dealership in October 2020). Officers also recovered firearms and ammunition likely belonging to Harkins (storage unit on West 120th Avenue burglarized in February 2021). Significantly, officers located a copy of the fraudulent Colorado Secretary of State paperwork for Complete Basement Systems including Timothy Mackey's name used to cash the check stolen from Michael and Megan Reisinger. Officers also located a yellow traffic vest consistent with suspects captured on video during the burglaries of the storage units at the facility on South Lewis Way in Jefferson County. *See Grand Jury Exhibit 2, Slides 93-96.*

On or about February 18, 2021, officers executed a search warrant at a storage unit #A88, located at Public Storage, 5788 6th Avenue, City of Lakewood, Jefferson County, rented by Tsosie. From that unit, officers recovered Everett Scovell's crossbow, as well as property belonging to Taylor and Zach Nagelvoort and Justin and Ally Henderson (associated with storage unit burglaries from earlier in the month at a facility on South Lewis Way). *See Grand Jury Exhibit 2, Slides 97-99.* On or about February 24, 2021, officers executed a second search warrant at this same unit and recovered items belonging to Gabriel Rodriguez and Victoria Ramirez (also associated with storage unit burglaries from earlier in the month at a facility on South Lewis Way). *See Grand Jury Exhibit 2, Slide 100.*

On or about February 24, 2021, officers executed a search warrant on a storage unit #C177, located at Public Storage, 1398 Simms Street, City of Lakewood, Jefferson County, rented by Final Concepts, LLC with Nathaniel Tsosie as an authorized user. From that unit, officers recovered musical instruments belonging to Justin and Mria Gamble. The Gamble's storage unit on Marshall Court in the Jefferson County had previously been burglarized sometime in November through December, 2020.

The State of Wyoming filed two amended counts against Jameson for the events occurring in Wyoming described above in the Circuit Court for the Fourth Judicial District, Case Number CR-2021-0004 (also referred to as CR-2021-0026): Count I, Theft in violation W.S. § 6-3-402(a)(c)(i); and Count II, Possession of Methamphetamine in violation of W.S. § 35-7-1031(c)(i)(B)(ii). On or about September 16, 2021, that Court sentenced Jameson to five to seven years in the Wyoming Department of Corrections based on his guilty plea to Count I.

The State of Wyoming filed three counts against Tsosie for the events occurring in Wyoming described above in the Circuit Court of the Fourth Judicial District, Case Number CR-2021-0024: Count I, Theft in violation W.S. § 6-3-402(a)(c)(i); Count II, Eluding Peace Officers in violation of W.S. § 31-5-225; and Count III, Reckless Driving in violation of W.S. § 31-5-229. On or about October 12, 2021, that Court sentenced Tsosie to five to seven years in the Wyoming Department of Corrections based on his guilty plea to Count I.

COUNT SEVENTY-NINE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,

C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 7)

Between and including February 19, 2021 to March 1, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Planet Honda, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT EIGHTY

IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1) (A) [F4] 1307G
(Series 7)

Between and including February 19, 2021 to March 21, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Jakob Holtzmann without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT EIGHTY-ONE

CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) [F6] 1011F
(Series 7)

Between and including February 19, 2021 to March 21, 2021, in the State of Colorado **Craig Keltner** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Jakob Holtzmann, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

COUNT EIGHTY-TWO

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H
(Series 7)

Between and including February 26, 2021 to March 12, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Sterling Auto Sales, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT EIGHTY-THREE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE – LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Series 7)

Between and including February 26, 2021 to March 5, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Urban Motors, without authorization, or by threat or deception, and retained

possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT EIGHTY-FOUR

SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031

(Series 7)

On or about February 26, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the building or occupied structure of Russell Bryant, and/or Public Storage, 5788 6th Avenue, City of Lakewood, Jefferson County, with the intent to commit therein the crime of Theft; in violation of section 18-4-203(1), C.R.S.

COUNT EIGHTY-FIVE

THEFT - \$2000 - \$5000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13

(Series 7)

On or about February 26, 2021, in the State of Colorado, **Craig Keltner** unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: tools, and other miscellaneous personal property, of Russell Bryant, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive Russell Bryant permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(f), C.R.S.

COUNT EIGHTY-SIX

PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] 41105

(Series 7)

On or about February 27, 2021, in the State of Colorado, **Craig Keltner** a customer of Fast Cash, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his identity and/or ownership for a purchase transaction or contract for purchase of tangible personal property, namely: tools; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT EIGHTY-SEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Series 7)

Between and including March 4, 2021 to March 13, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Clear Shift Auto, without authorization, or by threat or deception, and retained

possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT EIGHTY-EIGHT

**PAWNBROKER ACT VIOLATION - FALSE INFORMATION TO PAWNBROKER - BY
SELLER, C.R.S. 29-11.9-103(1);29-11.9-104(5) [F6] 41105**

(Series 7)

On or about March 6, 2021, in the State of Colorado, **Craig Keltner** a customer of Fast Cash, a pawnbroker, unlawfully, feloniously, and knowingly gave false information regarding his identity and/or ownership for a purchase transaction or contract for purchase of tangible personal property, namely: tools; in violation of sections 29-11.9-103(1) and 29-11.9-104(5), C.R.S.

COUNT EIGHTY-NINE

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H**

(Series 7)

On or about March 18, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Go Chevrolet, without authorization, or by threat or deception, and used the motor vehicle in the commission of the crime of Aggravated Motor Vehicles Theft as set forth in section 18-4-409, C.R.S., and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

COUNT NINETY

**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H**

(Series 7)

Between and including March 18, 2021 and April 10, 2021, in the State of Colorado, **Craig Keltner** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Echo Park, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The offenses alleged in Counts Seventy Nine through Ninety were committed in the following manner:

On or about February 19, 2021, a white male, identifying himself as “Jakob Holtzmann” and using a phone number 720-626-7865, took a 2017 white and black Dodge Durango, tag 019IXI, VIN 1C4SDJCT0HC623377, valued at \$33,300 for a test drive from Planet Honda, located at 15701 West Colfax Avenue, Golden, Jefferson County. The vehicle was not returned.

Significantly, this is the same phone number used to test drive and subsequently steal the Honda Civic Type R from Fowler Automotive Honda earlier in the month, wherein Keltner's DNA was located upon recovery. *See Grand Jury Exhibit 2, Slide 102.*

On or about February 26, 2021, a male customer identifying himself as "Jakob" with a phone number 720-226-4161, entered Sterling Auto Sales located at 2128 North Highway 83, Douglas County, and requested to test drive a white 2013 Jeep Grand Cherokee, VIN 1C4RJFDJ1DC541315, valued at \$33,950. The surveillance video from the dealership showed a dark Dodge Ram with a construction light arriving at the time of the test drive. Thereafter, the pickup truck and the Sterling Auto Sales Jeep left the lot together. The vehicle was not returned. *See Grand Jury Exhibit 2, Slide 103-104.*

On or about February 26, 2021, a male with a drivers license in the name of "Jakob Holtzmann," and a date of birth of April 9, 1997 and a phone number, 720-226-4161 test drove a 2009 black Jeep Grand Cherokee, VIN 1J8HR78W39C541574, tag BEWZ26 valued at \$15,375.00, from Urban Motors located at 1840 Wadsworth Boulevard, Lakewood, Jefferson County. Thereafter, the vehicle was not returned. *See Grand Jury Exhibit 2, Slide 108-110.*

On or about February 26, 2021, staff at the Public Storage, located at 5788 West 6th Avenue Frontage Road, City of Lakewood, Jefferson County, discovered a lock missing from unit A86, rented by Russell Bryant. Upon inspection, Bryant reported the following items missing: multiple tools, including Milwaukee brand power tools (drills and impact drills), Milwaukee Packout boxes, Snap-on socket sets, and Craftsman socket sets, with a total value of \$4,997. Tsosie rented a unit at this location, unit A88. *See Grand Jury Exhibit 2, Slide 110.*

On or about February 27, 2021, a male presented a drivers license in the name of "Jakob Holtzmann" and pawned five tools at Fast Cash, 2648 South Parker Road, City of Aurora, Arapahoe County. Officers located and interviewed the real Jakob Holtzmann who confirmed he has never pawned any items. Notably, the pawned tools were similar to those taken from West 6th Avenue Public Storage facility the day prior and belonging to Russell Bryant. A fingerprint collected at the time of this transaction was consistent with Keltner. *See Grand Jury Exhibit 2, Slide 111-112.*

On or about March 1, 2021, the Planet Honda Dodge Durango was recovered in the area of 547 West 91st Avenue, Adams County. At the time of recovery, the vehicle was missing its tires.

On or about March 4, 2021, a white male using the name "Jakob Holtzmann," and a phone number 720-226-4161, test drove a 2020 white Dodge 2500 Power Wagon truck, tag BIK811, VIN 3C6TR5EJ2LG267083, valued at \$54,000 from Clear Shift Auto, 1500 East County Line Road, Highlands Ranch, Douglas County. The same phone number had previously been used in association with the Jakob Holtzmann identity to secure test drives and subsequent thefts from Sterling Auto Sales and Urban Motors, described above, and later at O'Meara Ford, described below. The male arrived at the dealership in white Jeep Grand Cherokee, similar to the vehicle previously stolen from Sterling Auto Sales described above. The Clear Shift Auto Power Wagon was not returned. According to statements from dealership employees/agents, on

or about March 13, 2021, they paid a male an unspecified amount of money to recover the vehicle. The male threatened employees regarding further reports of the theft. *See Grand Jury Exhibit 2, Slide 114.*

On or about March 5, 2021, officers recovered the Urban Motors Jeep Cherokee at 6087 Olde Wadsworth, Jefferson County. This is the same location where the Fowler Automotive Honda vehicle had previously been recovered in February, 2021, and Keltner was known to stay at unit 210. Officers contacted unit 210, but Keltner was not there. Officers contacted witness Bradley Lemerand in unit 210 who stated the Jeep belonged to “CJ Keltner.” Zachary Flynn was also contacted in unit 210 and identified Keltner from a photo. Officers had previously contacted Flynn in December 2020, in a Dodge Ram pickup stolen from Family Trucks and Vans Dealerships, that Craig Keltner and a female were also contacted in. *See Series Two, Counts Eleven through Twenty Two, above, incorporated by reference herein.* At the time of recovery, the license plate displayed on the Urban Motors Jeep Cherokee, OTG125 listed to a 2012 black Jeep Cherokee. The proper dealer plate was later located in the glovebox. A handwritten note with the name “Craig Keltner” was also recovered from the vehicle. Andrea Wettig’s DNA was later identified from the steering wheel of the Urban Motors Jeep Cherokee. *See Grand Jury Exhibit 2, Slide 108-110.*

On or about March 6, 2021, a male presented a drivers license in the name of “Jakob Holtzmann” and pawned five tools and a compressor at Fast Cash, 4155 South Broadway, City of Englewood, Arapahoe County. Officers contacted the real Holtzmann who confirmed he had never pawned any items. Notably, the pawned tools were similar to those taken from West 6th Avenue Public Storage facility on February 26, 2021 and belonging to Russell Bryant. A photo taken at the time of this transaction is consistent with Keltner. Also, Keltner wears a vest in the Fast Cash photo similar to vest the suspect wears in the surveillance footage from Sterling Autos Sales on February 26, 2021. *See Grand Jury Exhibit 2, Slide 115-116; 104.*

On or about March 12, 2021, the Sterling Auto Sales Jeep Cherokee was recovered at 1855 Independence Street, Lakewood, Jefferson County. At the time of recovery, the hood of the vehicle had been painted black. Keltner’s DNA was found on a cigarette remnant on the driver floor. The vehicle also had significant front end damage. *See Grand Jury Exhibit 2, Slide 105-107.*

Officers recovered a license plate SOY168 recovered inside the Sterling Auto Sales Jeep Cherokee. Upon further investigation, this plate had been reported stolen out of Thornton, Adams County, on or about March 5, 2021. The owner described a white male and white female stealing her license plate from her vehicle while it was parked, and swapping it for another plate. *See Grand Jury Exhibit 2, Slide 105-107.*

The SOY168 license plate was observed on a white Jeep Grand Cherokee with a black stripe on its hood that was involved in a suspected storage unit burglary at West Jewell Avenue in Jefferson County on or about February 28, 2021. On that date, the white Jeep Grand Cherokee entered the facility using an access code for an account belonging to a “Cynthia Kuper,” created three days prior and later determined to be fraudulent. A white Jeep with a black stripe on its hood also used the fraudulent Kuper code to enter the same storage facility again on March 7,

2021. This is the same storage facility where Marti Davis has unit #K020, that was previously searched on February 17, 2021. The City of Edgewater also reported this vehicle had been involved in a hit and run accident. *See Grand Jury Exhibit 2, Slide 105-107, 113.*

On or about March 13, 2021, a white male using the name “Jakob Holtzmann” with a phone number 720-226-4161, test drove a 2019 Dodge Ram 2500 truck, VIN 3C6UR5JL2KG605821 valued at \$47,499, from to O’Meara Ford, located at 400 West 104th Avenue, City of Northglenn, Adams County. The same phone number had previously been used in association with the Jakob Holtzmann identity to secure test drives and subsequently steal vehicles from Sterling Auto Sales, Urban Motors, and Clear Shift Autos, described above. The vehicle was not returned to the dealership. *See Grand Jury Exhibit 2, Slide 117.*

On or about March 18, 2021, a male used a drivers license in the name “Christopher Albertson” to test drive a 2019 white Chevrolet Silverado, tag CFY-802, VIN# 1GC1KTEY9KF175488, valued at \$50,000 from Go Chevrolet, located at 7320 North Broadway, Adams County. The vehicle was not returned to the dealership. Dealership employees used the vehicle’s technology to track the 2019 Chevrolet Silverado to Arapahoe County. Based on that information, law enforcement officers located the Go Chevrolet 2019 Chevrolet Silverado parked between the Groove Mazda dealership (10301 East Arapahoe Road, Centennial, Arapahoe County) and Echo Park Automotive (10401 East Arapahoe Road, Centennial, Arapahoe County). *See Grand Jury Exhibit 2, Slide 118-121.*

Officers attempted to contact the Go Chevrolet 2019 Chevrolet Silverado, then occupied by Andrea Wettig. Wettig drove off, eluding deputies and ramming their patrol vehicles. A firearm belonging to Christopher Harkins, stolen from the West 120th Avenue Extra Space Storage between February 2, 2021 and February 3, 2021, was recovered from the truck. A drivers license belonging to Noah Lewton, a drivers license belonging to Robert Moultrie, an identification card belonging to Courtney Cox, and a social security card belonging to Hasan Metiner were also recovered. Officers subsequently took Wettig into custody. *See Grand Jury Exhibit 2, Slide 118-121.*

Wettig was charged with several offenses related to this incident in Arapahoe County District Court Case Number 21CR669, including: Aggravated Motor Vehicle Theft, pursuant to C.R.S. § 18-4-409(2)(3)(a.5) and Vehicular Eluding, pursuant to C.R.S. § 18-9-116.5. On or about September 13, 2021, the Court sentenced Wettig to eight years in the Department of Corrections based on her guilty pleas to multiple counts.

While officers attempted to contact Wettig in the Go Chevrolet 2019 Chevrolet Silverado, a white male entered the Echo Park Dealership, 10401 East Arapahoe Road, City of Centennial, Arapahoe County. The male gave a drivers license and insurance card in name of “Jakob Holtzmann” and requested to test drive a 2017 silver Hyundai G80, VIN KMHGN4JE7HU178165, plate QIT-579, valued at \$24,000. Thereafter, the vehicle was not returned to the dealership. *See Grand Jury Exhibit 2, Slide 122.*

On or about March 20, 2021, a male went to the Larry H. Miller Chrysler Dodge, located at 1800 West 104th Avenue, Thornton, Adams County, and presented a drivers license for

“Christopher Albertson” to test drive a 2019 Dodge Ram 1500 Rebel, VIN 1C6SRFETZKN875295, valued at \$40,000. The vehicle not returned to the dealership. *See* Grand Jury Exhibit 2, Slide 123-124.

On or about March 20, 2021, officers located Craig Kelter and David Powell, as well as the O’Meara Ford 2019 Dodge Ram and the Larry H. Miller 2019 Dodge Ram, at 1091 Morrison Lane, Empire, Clear Creek County, following a reported burglary. The two stolen vehicles were stuck in snow. During an ensuing confrontation with responding deputies, Powell was killed. Keltner attempted to escape on foot but was ultimately apprehended and the stolen vehicles recovered. *See* Grand Jury Exhibit 2, Slide 123-124.

Keltner was charged with several offenses related to this incident in Clear Creek County District Court Case Number 21CR42, including Aggravated Motor Vehicle Theft, pursuant to C.R.S. § 18-4-409. On or about April 25, 2022, the Court sentenced Keltner to fifteen years Department of Corrections based on his guilty plea in this matter.

On or about April 10, 2021, officers recovered the Echo Park 2017 Hyundai in the parking lot of the 7-11 near W 72nd Ave. and Sheridan Boulevard in Westminster, Jefferson County. *See* Grand Jury Exhibit 2, Slide 122.

On or about April 6, 2021, Keltner submitted to an interview and made multiple statements regarding his activities between November 2020 and March 2021, as well as his associations with Tsosie, Jameson and Wettig. Keltner referred to “Nate Tsosie” as being “dear to his heart,” and a “partner.” Keltner identified Jameson via photos and referred to Jameson and Tsosie as “[his] guys.” Keltner referred to a “crew” and described Lakewood as “one of [his] stomping grounds.”

Regarding David Powell, Keltner admitted that he had not been committing crimes with him for very long and Powell also knew Jameson. Keltner stated that Tsosie had known Dustin James for a long time, and James had access to large amounts of drug and connections for guns and body armor. Keltner admitted that Wettig was his girlfriend, and described Shelby Fadely and Riley Fisher as previous girlfriends of Tsosie. Keltner stated that Tsosie was not happy with him because they were best friends and Keltner had not written or sent any money to Tsosie while he was incarcerated in Wyoming.

Keltner described a firearm recovered from the Silver Dodge Durango driven by Tsosie in Wyoming. Keltner acknowledged several fictitious names used by the group including Jakob Holtzmann, Timothy Mackey, Noah Lewton, Courtney Cox, and possibly Alexander Collins. Keltner admitted that he had a storage unit at a facility that the group had targeted. Keltner stated that he posed as police officer or a construction worker, including putting on a vest and a light on his vehicle, to avoid questioning or apprehension.

While incarcerated in the Clear Creek County Jail, Keltner made calls to phone numbers belonging to Marti Davis, Zachary Palone, and Aja Budde. Keltner sent and/or received mail from the following people while incarcerated at Clear Creek County Jail: Nathaniel Tsosie, Zachary Palone, Aja Budde, and Andrea Wettig.

On or about April 12, 2022, Andrea Wettig submitted to an interview. Wettig stated that she had previously been in a relationship with Keltner who she also referred to as “CJ.” They ended their relationship just prior to the March 18, 2021 incident; however, they still kept in contact. Wettig confirmed that Keltner was friends with “Nate,” and they were involved in criminal activity. Wettig was aware that Keltner went to storage units. Regarding the March 18, 2021 episode, Wettig confirmed that Keltner picked her up and they drove to a dealership where he obtained the Chevrolet Silverado (Go Chevrolet). They moved all of the contents from the vehicle they arrived in to the Chevrolet Silverado, including a shotgun (presumably, the recovered Harkins firearm). Keltner parked the Chevrolet Silverado near Arapahoe Road and Havana and Wettig believed that they were at another dealership. Wettig was alone in the Chevrolet Silverado when officers arrived.

In June 2022, Tsosie sent correspondence to Jameson, who he referred to as “Jamo.” Tsosie referred to Jameson as “bro” and “friend,” and apologized that he had “ended up in prison.” Tsosie asked Jameson to pass along an update to their mutual acquaintances, and asked about Jameson’s recent visit – possibly a reference to a visit to Jameson by law enforcement. Tsosie signed his letter to Jameson “Vanilla Gorilla,” consistent with his social media profile.

In July 2022, Tsosie received correspondence from Keltner. Keltner continued to refer to Tsosie as “brother” and “fam” and stated that that “[they] went through some crazy shit last year.” Keltner discussed how close he felt to Tsosie and described their “mission” as “super real.” Keltner referred to Wettig and her conviction and sentence from the March 18, 2021 incident and stated “he felt bad for having her out there,” and that he blamed himself for “having her out in the streets with me [doing] the most.”


Tsosie and Marti Davis also exchanged correspondence that reflected their personal relationship. Davis stated that she loved and missed Tsosie, and referred to Tsosie as “family.” Davis described to Tsosie an interview with law enforcement where she had referred to Tsosie as her “best friend,” and informed that Riley Fisher was her daughter and Davis had introduced Fisher and Tsosie. In correspondence to Davis, Tsosie describes the eluding incident with the Auto Nation black Audi on January 6, 2021 and states that it was Dustin James that ran from police that day. Tsosie and Davis continually discuss Riley Fisher in their letters.

On or about May 10, 2022 Marti Davis was interviewed by law enforcement. She continued to describe Tsosie as her “best friend,” and stated that Tsosie dated her daughter Riley Fisher one year prior to his recent arrest. Davis stated that Fisher and Tsosie met through her. Davis knew Keltner as well, who she referred to as “CJ,” and that she, Tsosie and CJ were friends. She also knew Justin Jameson.

On or about May 16, 2022, Justin Jameson was interviewed by law enforcement. Jameson referred to Tsosie as “Nate,” and described him as his “best friend.” He stated he met Tsosie in November 2020. Jameson believed that Fisher was Tsosie’s girlfriend. During this interview, officers determined that Jameson knew Keltner, but only knew him as “CJ,” and had met him in February 2021. Jameson initially stated he did not know Dustin James, but later referred to him as “a piece of shit.” Jameson described Marti Davis as his “homegirl.” When shown a

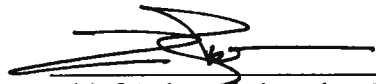
photograph depicting two male suspects at the Key Auto location in Lakewood on December 5, 2020 (where the male on the left displayed a police badge), Jameson confirmed he knew the male on the left in the photograph, but refused to identify the male. Jameson identified a photograph of the Audi as the vehicle he was arrested in while in Wyoming and that it was initially blue but later spray painted white. He admitted to stealing the Audi from a dealership but claimed no one else was involved. Jameson admitted the photograph on the fraudulent Alexander Collins DL was him (Jameson) and spoke about how he can make up fraudulent licenses on the computer in less than five minutes. *See* Grand Jury Exhibit 3, Slide 27.

PHILIP J. WEISER
ATTORNEY GENERAL
STATE OF COLORADO


SARAH E. MCCUTCHEON. #33242
Senior Assistant Attorney General
Special Prosecution Unit
Criminal Justice Section

The 2022-2023 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 15th day of December, 2022.

Pursuant to §13-73-107, C.R.S., the Court designates ~~Denver~~ ^{Jefferson SEW} County, Colorado as the county of venue for the purposes of trial.


Chief Judge Christopher J. Baumann
Presiding Judge, State Grand Jury