

DISTRICT COURT, CITY AND COUNTY OF DENVER,
COLORADO

1437 Bannock Street
Denver, CO 80202

THE PEOPLE OF THE STATE OF COLORADO,

v.

ESEQUIEL GOMEZ, DOB 3/20/89

FELIPE GARCIA-RAMIREZ, DOB 4/24/93

RENE RUIZ, DOB 11/18/99

AMY LOUISE CRUZ, DOB 11/16/87

ULICES VENZOR, DOB 4/16/93

CESAR JOEL CHAVEZ, DOB 7/2/98

GABRIEL LEYVA-VALDEZ, DOB 9/3/90

DEMI IDA MAESTAS, DOB 8/14/91

JONATHAN GARCIA VALDIVIA, DOB 10/14/03

OMAR ABRAHAM MARIN-BERUMEN, DOB 10/19/80

RENE SILVA CASTANEDA, DOB 10/12/90

ALAN MONCERRAT CABALLERO, DOB 12/27/01

FABIAN VARELA-CASTILLO, DOB 12/16/93

JOSE ALFREDO RIVAS-RAMIREZ, DOB 1/19/92

JOSE GUTIERREZ-OCON, DOB 9/3/92

EPITACIO MALDONADO MIRANDA, DOB 7/17/00

Defendants.

PHILIP J. WEISER, Attorney General

SARAH E. McCUTCHEON,

Senior Assistant Attorney General*

1300 Broadway, 9th Floor

Denver, Colorado 80203

(720) 508-6700

Registration Number: 33242

*Counsel of Record

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CASE NUMBER: 2023CR3116

▲ COURT USE ONLY

Grand Jury Case No.:
22CR001

Ctrm: 259

COLORADO STATE GRAND JURY INDICTMENT

- COUNT ONE** COCCA – PATTERN OF RACKETEERING – PARTICIPATION IN AN ENTERPRISE; §§ 18-17-104(3) AND 18-7-105, C.R.S. [F2] **37284**
- COUNT TWO** COCCA – CONSPIRACY, C.R.S. §§ 18-17-104(4) AND 18-17-104(3) [F2] **37285**
- COUNT 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 FOUR** AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] **0804G**
- COUNT FIVE** AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] **0804G**
- COUNT SIX** THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] **08A13**
- COUNT SEVEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] **0804G**
- COUNT EIGHT** SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] **06031**
- COUNT NINE** THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(G) [F4] **08A15**
- COUNT TEN** THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] **08A13**
- COUNT ELEVEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] **0804G**
- COUNT TWELVE** AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] **0804G**

- COUNT THIRTEEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT FOURTEEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT FIFTEEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT SIXTEEN** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT SEVENTEEN** CHOP SHOP – OWN OR OPERATES , C.R.S. 18-4-
420(1)(A),(2) [F4] **08161**
- COUNT EIGHTEEN** THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5]
08A14
- COUNT NINETEEN** 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** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT TWENTY-ONE** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**
- COUNT TWENTY-TWO** CHOP SHOP – OWN OR OPERATES , C.R.S. 18-4-
420(1)(A),(2) [F4] **08161**
- COUNT TWENTY-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 TWENTY-FOUR** AGGRAVATED MOTOR VEHICLE THEFT IN THE
FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-
409(2),(3)(A) [F5] **0804G**

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

COUNT TWENTY-SIX AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804E**

COUNT TWENTY-SEVEN CHOP SHOP – OWN OR OPERATES , C.R.S. 18-4-420(1)(A),(2) [F4] **08161**

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

COUNT TWENTY-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 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 - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] **08A13**

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

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

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

COUNT THIRTY-SEVEN AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804E**

COUNT THIRTY-EIGHT	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5); 18-2-101 [F5] 0804HA
COUNT THIRTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FORTY	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FORTY-ONE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT FORTY-TWO	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FORTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT FORTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FORTY-FIVE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FORTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - OVER \$100,000, C.R.S. 18-4-409(2),(3)(B) [F3] 0804J
COUNT FORTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FORTY-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 FORTY-NINE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031

COUNT FIFTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FIFTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FIFTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT FIFTY-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 FIFTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - OVER \$100,000, C.R.S. 18-4-409(2),(3)(B) [F3] 0804J
COUNT FIFTY-FIVE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FIFTY-SIX	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FIFTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031
COUNT FIFTY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT FIFTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT SIXTY	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT SIXTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SIXTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D

COUNT SIXTY-THREE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SIXTY-FOUR	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A), 18-2-101 [F6] 0804DA
COUNT SIXTY-FIVE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT SIXTY-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 SIXTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT SIXTY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT SIXTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT SEVENTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SEVENTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SEVENTY-TWO	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SEVENTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804K
COUNT SEVENTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804K

COUNT SEVENTY-FIVE	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT SEVENTY-SIX	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091
COUNT SEVENTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT SEVENTY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT SEVENTY-NINE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT EIGHTY	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-ONE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT EIGHTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT EIGHTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT EIGHTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT EIGHTY-FIVE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT EIGHTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D

COUNT EIGHTY-SEVEN AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804K**

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

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 FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] **06015**

COUNT NINETY-ONE VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] **36091**

COUNT NINETY-TWO ATTEMPTED SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A), 18-2-101 [F5] **06035A**

COUNT NINETY-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 NINETY-FOUR AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804K**

COUNT NINETY-FIVE AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804K**

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

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

COUNT NINETY-EIGHT AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] **0804K**

COUNT NINETY-NINE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT ONE HUNDRED	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED ONE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED 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 ONE HUNDRED FOUR	THEFT - \$1,000 - \$2,000, C.R.S. 18-4-401(1),(2)(E) [M1] 08A1A
COUNT ONE HUNDRED FIVE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804K
COUNT ONE HUNDRED SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED 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 ONE HUNDRED 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 ONE HUNDRED TEN	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 ONE HUNDRED ELEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED TWELVE	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 ONE HUNDRED THIRTEEN	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 ONE HUNDRED FOURTEEN	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED FIFTEEN	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091
COUNT ONE HUNDRED SIXTEEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED SEVENTEEN	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 ONE HUNDRED EIGHTEEN	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED NINETEEN	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091
COUNT ONE HUNDRED TWENTY	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED TWENTY-ONE	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED TWENTY-TWO	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091
COUNT ONE HUNDRED 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 ONE HUNDRED TWENTY-FOUR	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(G) [F4] 08A15
COUNT ONE HUNDRED TWENTY-FIVE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED TWENTY-SIX	SECOND DEGREE ARSON - \$5,000 TO \$20,000 DAMAGE - PROPERTY OTHER THAN A BUILDING, C.R.S. 18-4-103(1),(2)(E) [F5] 05027
COUNT ONE HUNDRED TWENTY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED TWENTY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED TWENTY-NINE	FORGERY OF CHECKS OR COMMERCIAL INSTRUMENTS, C.R.S. 18-5-102(1)(C) [F5] 1001C
COUNT ONE HUNDRED THIRTY	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 ONE HUNDRED THIRTY-ONE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED 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 ONE HUNDRED THIRTY-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 ONE HUNDRED THIRTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED THIRTY-FIVE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D

COUNT ONE HUNDRED THIRTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED THIRTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED THIRTY-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 ONE HUNDRED THIRTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED FORTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FORTY-ONE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED FORTY-TWO	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED FORTY-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 ONE HUNDRED FORTY-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 ONE HUNDRED FORTY-FIVE	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED FORTY-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 ONE HUNDRED FORTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FORTY-EIGHT	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14

COUNT ONE HUNDRED FORTY-NINE	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091
COUNT ONE HUNDRED FIFTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FIFTY-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 ONE HUNDRED 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 ONE HUNDRED FIFTY-THREE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FIFTY-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 ONE HUNDRED FIFTY-FIVE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FIFTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - OVER \$100,000, C.R.S. 18-4-409(2),(3)(B) [F3] 0804J
COUNT ONE HUNDRED FIFTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED FIFTY-EIGHT	THEFT - \$100,000 - \$1,000,000, C.R.S. 18-4-401(1),(2)(I) [F3] 08A16
COUNT ONE HUNDRED FIFTY-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 ONE HUNDRED SIXTY	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED SIXTY-ONE	CRIMINAL MISCHIEF - \$20,000 - \$100,000, C.R.S. 18-4-501(1),(4)(F) [F4] 0901L
COUNT ONE HUNDRED SIXTY-TWO	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14

COUNT ONE HUNDRED SIXTY-THREE	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED SIXTY-FOUR	THEFT - \$100,000 - \$1,000,000, C.R.S. 18-4-401(1),(2)(I) [F3] 08A16
COUNT ONE HUNDRED SIXTY-FIVE	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 ONE HUNDRED SIXTY-SIX	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED SIXTY-SEVEN	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED SIXTY-EIGHT	CRIMINAL MISCHIEF - \$20,000 - \$100,000, C.R.S. 18-4-501(1),(4)(F) [F4] 0901L
COUNT ONE HUNDRED SIXTY-NINE	VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT ONE HUNDRED SEVENTY	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED SEVENTY-ONE	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED SEVENTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED SEVENTY-THREE	FIRST DEGREE BURGLARY - DEADLY WEAPON, C.R.S. 18-4-202(1) [F3] 06015
COUNT ONE HUNDRED SEVENTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED SEVENTY-FIVE	VIOLENT CRIME - USED DEADLY WEAPON, C.R.S. 18-1.3-406(2)(A)(I)(A) [SE] 36091

COUNT ONE HUNDRED SEVENTY- 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 ONE HUNDRED SEVENTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED SEVENTY-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 ONE HUNDRED SEVENTY-NINE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED EIGHTY	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED EIGHTY-ONE	ATTEMPTED SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A), 18-2-101 [F5] 06035A
COUNT ONE HUNDRED EIGHTY-TWO	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED 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 ONE HUNDRED EIGHTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED EIGHTY-FIVE	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 ONE HUNDRED EIGHTY-SIX	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED 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 ONE HUNDRED EIGHTY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED EIGHTY-NINE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$2,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804K
COUNT ONE HUNDRED NINETY	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F5] 0804D
COUNT ONE HUNDRED NINETY-ONE	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(G) [F4] 08A15
COUNT ONE HUNDRED NINETY-TWO	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT ONE HUNDRED NINETY-THREE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT ONE HUNDRED NINETY-FOUR	UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE - MORE THAN 4 GRAMS OF SCHEDULE I OR II, C.R.S. 18-18-403.5(1),(2)(A) [DF4] 8101D
COUNT ONE HUNDRED NINETY-FIVE	SPECIAL OFFENDER - FIREARM, C.R.S. 18-18-407(1)(D)(II) [DF1] 33A46
COUNT ONE HUNDRED NINETY-SIX	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT ONE HUNDRED NINETY-SEVEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED NINETY-EIGHT	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED NINETY-NINE	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035
COUNT TWO HUNDRED	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1),(2)(A) [F4] 06035

**COUNT TWO HUNDRED
ONE**

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

DISTRICT COURT, CITY AND COUNTY OF DENVER,
COLORADO
1437 Bannock Street
Denver, CO 80202

THE PEOPLE OF THE STATE OF COLORADO,

v.

ESEQUIEL GOMEZ, DOB 3/20/89

FELIPE GARCIA-RAMIREZ, DOB 4/24/93

RENE RUIZ, DOB 11/18/99

AMY LOUISE CRUZ, DOB 11/16/87

ULICES VENZOR, DOB 4/16/93

CESAR JOEL CHAVEZ, DOB 7/2/98

GABRIEL LEYVA-VALDEZ, DOB 9/3/90

DEMI IDA MAESTAS, DOB 8/14/91

JONATHAN GARCIA VALDIVIA, DOB 10/14/03

OMAR ABRAHAM MARIN-BERUMEN, DOB 10/19/80

RENE SILVA CASTANEDA, DOB 10/12/90

ALAN MONCERRAT CABALLERO, DOB 12/27/01

FABIAN VARELA-CASTILLO, DOB 12/16/93

JOSE ALFREDO RIVAS-RAMIREZ, DOB 1/19/92

JOSE GUTIERREZ-OCON, DOB 9/3/92

EPITACIO MALDONADO MIRANDA, DOB 7/17/00

Defendants.

PHILIP J. WEISER, Attorney General

SARAH E. McCUTCHEON,

Senior Assistant Attorney General*

1300 Broadway, 9th Floor

Denver, Colorado 80203

(720) 508-6700

Registration Number: 33242

*Counsel of Record

▲ COURT USE ONLY

Grand Jury Case No.:
22CR001

Ctrm: 259

COLORADO STATE GRAND JURY INDICTMENT

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
ESEQUIEL GOMEZ (130 Total Counts)	1, 2, 8-10, 30-33, 37-44, 48-54, 61-68, 70-72, 75-88, 90-92, 114, 115, 118-126, 130-196
FELIPE GARCIA-RAMIREZ (35 Total Counts)	1, 2, 11-15, 17, 18, 20-22, 25, 27, 29, 35, 36, 47, 49, 50, 52, 55-59, 94, 95, 110, 111, 113, 198-201
RENE RUIZ (29 Total Counts)	1, 2, 4, 69, 74, 107-113, 131-136, 150-156, 197, 199, 200, 201
AMY LOUISE CRUZ (28 Total Counts)	1, 2, 8-10, 30-33, 38-41, 44, 70, 71, 79-88, 90, 92
ULICES VENZOR (22 Total Counts)	1, 2, 3, 73, 131-148
CESAR JOEL CHAVEZ (18 Total Counts)	1, 2, 45, 46, 102-112, 116, 117, 127
GABRIEL LEYVA-VALDEZ (14 Total Counts)	1, 2, 5, 6, 13, 16, 19, 20, 89, 93, 96-99
DEMI IDA MAESTAS (12 Total Counts)	1, 2, 114, 131-134, 136, 182, 183, 184, 185
JONATHAN GARCIA VALDIVIA (7 Total Counts)	1, 2, 23, 24, 34, 100, 101
OMAR ABRAHAM MARIN-BERUMEN (5 Total Counts)	1, 2, 36, 128, 129
RENE SILVA CASTANEDA (3 Total Counts)	7, 116, 117
ALAN MONCERRAT CABALLERO (2 Total Counts)	26, 35
FABIAN VARELA-CASTILLO (2 Total Counts)	28, 29

JOSE ALFREDO RIVAS-RAMIREZ (2 Total Counts)	60, 127
JOSE GUTIERREZ- OCON (1 Total Count)	34
EPITACIO MALDONADO MIRANDA (1 Total Count)	102

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 August 16, 2021 and July 19, 2022, in the State of Colorado, **Esequiel Gomez, Felipe Garcia-Ramirez, Gabriel Leyva-Valdez, Rene Ruiz, Amy Louise Cruz, Jonathan Garcia Valdivia, Ulices Venzor, Omar Abraham Marin-Berumen, Cesar Joel Chavez and Demi Ida Maestas**, 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 August 16, 2021 and July 19, 2022, in the State of Colorado, **Esequiel Gomez, Felipe Garcia-Ramirez, Gabriel Leyva-Valdez, Rene Ruiz, Amy Louise Cruz, Jonathan Garcia Valdivia, Ulices Venzor, Omar Abraham Marin-Berumen, Cesar Joel Chavez and Demi Ida Maestas**, 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: **Esequiel Gomez, Felipe Garcia-Ramirez, Gabriel Leyva-Valdez, Rene Ruiz, Amy Louise Cruz, Jonathan Garcia Valdivia, Ulices Venzor, Omar Abraham Marin-Berumen, Cesar Joel Chavez, Demi Ida Maestas, Rene Silva Castaneda, Alan Moncerrat Caballero, Fabian Varela-Castillo, Jose Gutierrez-Ocon, Jose Alfredo Rivas-Ramirez, Epitecio Maldonado Miranda, Michelle Torres**, and other person 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 between August 2021 and July 2022 throughout the greater Denver metropolitan area. The purpose of the enterprise focused generally on thefts of motor vehicles from private parties, thefts of motor vehicles from commercial dealerships and/or automotive repair shops, and burglaries of commercial and retail

businesses. The activities of the enterprise included trespasses to vehicles for the purposes of accessing and stealing their contents, including firearms, thefts of catalytic converters, thefts of personal identifying information and financial transactions devices from businesses, thefts of recreational vehicles for temporary housing for members of the enterprise, and the trade, distribution, and sale of stolen property and vehicles.

One purpose of the motor vehicles thefts, whether stolen from private parties, commercial dealerships, automotive repair shops, rental companies, or other commercial businesses where vehicles might be present, was to conceal the identities of the members of the enterprise and evade apprehension by law enforcement during the commission of other illicit activities. For example, stolen vehicles were identified and recovered at the scenes of numerous burglaries. Stolen vehicles themselves served as the mechanism for forced entries during burglaries, with the enterprise members' common *modus operandi* being to use stolen trucks to ram the doors, windows, or garage doors of businesses. Stolen vehicles were also used for transportation of stolen goods.

Members frequently altered the appearance of stolen vehicles, either by the application of window tinting or decals, the removal of decals or badging, or the display of license plates not legitimately associated with the vehicle. Vehicle identification numbers (VINs) were swapped, defaced, or removed. Members used some stolen vehicles as personal vehicles for daily driving for extended periods of time, with members collaborating in efforts to legitimize the stolen vehicle, *e.g.* through an title altered, license plates, or swapped VIN from a salvaged VIN. *See* Count Thirty-Four. Other stolen vehicles were stored collectively, with members acting as caretakers for the storage property. Some stolen vehicles were used only briefly by members of the enterprise to commit other offenses. Some stolen vehicles were used for their component parts in service of other vehicles. Stolen vehicles were shared or used by members, or transferred to other members or third parties.

With respect to the burglaries, members frequently victimized automotive dealerships or repair shops, stealing multiple vehicles during a single episode. Several burglaries occurred during single episodes. Burglaries occurred during the overnight or early morning hours when the businesses were not open. Members gained access to the dealerships by ramming a garage door with a stolen vehicle and then located the key boxes that contained keys to the dealerships' or customers' vehicle keys which were also broken open. Stolen vehicles were also used to force exit from businesses, driving through garage doors to flee the scene. In addition, members of the enterprise targeted locksmith and/or security businesses for burglaries, stealing property that would further the members on-going burglary and motor vehicle theft activities, including keys, key fobs, automotive diagnostic tools, automotive reprogramming devices, and tools. Recovered stolen vehicles showed evidence of having been reprogrammed such that their owners' keys and key fobs no longer worked—*i.e.* the members of the enterprise had reprogrammed the vehicle to be opened and started with alternative key fobs. During numerous burglaries, surveillance video captured at least one participant carrying a firearm during the commission of the burglary while inside the victim businesses. Significantly, in some instances, firearms were used as another

mechanism of forced entry, *e.g.* front glass windows were shot out, breaking the glass and allowing the suspects to enter through broken window panes or glass doors.

During all times relevant to this indictment, the members of the enterprise maintained a high level of frequent and on-going communication. Members used a variety of digital methods to communicate, including but not limited to social media platforms, such as Facebook, text messages, cellular communications devices, and walkie-talkies. Members of the enterprise had interpersonal relationships separate and apart from the enterprise: Felipe Garcia-Ramirez was known to be Omar Abraham Marin-Berumen's "cousin." Investigators have yet to confirm if this an actual familial relationship or a social moniker. Felipe Garcia-Ramirez and Michelle Torres were also in a romantic relationship, as were Esequiel Gomez and Amy Louise Cruz, and Esequiel Gomez and Demi Ida Maestas at alternating and overlapping time periods. Rene Ruiz and Cesar Chavez resided together for a period of time in Adams County.

In addition, many of the acts of racketeering were committed by several small groups of members of the enterprise acting together. For example, surveillance video from burglaries captured multiple suspects arriving in multiple vehicles and participating in the offense. Such coordinated activity required a level of on-going planning, communication and coordination to execute. Social media messages are consistent with such a level of planning. Members of the enterprise would exchange images of vehicles for the purported purpose of targeting that vehicle. In addition, different members of the enterprise stole vehicles from two different car haulers parked in the same Lakewood, Jefferson County area months apart. (*See* Counts Thirty-Eight through Forty-One, compared with Counts One Hundred Seven through One Hundred Thirteen.)

During all times relevant to this indictment, members of the enterprise associated with common residences and locations. Pole camera surveillance captured multiple members of the enterprise present at different times, with various stolen vehicles, at residences associated with Omar Abraham Marin-Berumen and Felipe Garcia-Ramirez in Adams County. Members of the enterprise also rented units at storage facilities in Adams and Jefferson Counties that stored stolen property connected to the activities of the enterprise, including vehicles, vehicle parts, and property belonging to victims' businesses.

Members fulfilled varying and alternating roles within the enterprise. Omar Abraham Marin-Berumen stated that Ulices Venzor directed the activities of other members. Esequiel Gomez and Felipe Garcia-Ramirez participated consistently, extensively, and repeatedly in the burglary side of the enterprise with the assistance of multiple other known and unknown members of the enterprise, while most members of the enterprise engaged in motor vehicle theft activity. Members of the enterprise identified Garcia-Ramirez as the individual responsible for overseeing storage of stolen vehicles at various locations. The residence of Omar Abraham Marin-Berumen was frequented by numerous members of the enterprise as documented by surveillance pole cameras.

The purpose of the enterprise was to maintain the members' lifestyle and their continued ability to commit illicit activities. Illicit activity appeared to be the members' method of financial support.

Members of the enterprise working in concert with each other and/or with persons known and unknown to the Grand Jury, stole at least one hundred and thirty-nine (139) vehicles, with a total aggregate value in excess of \$3,500,000 between August 2021 and July 2022. During that same time period, members of the enterprise committed approximately forty-eight (48) burglaries.

PATTERN OF RACKETEERING ACTIVITY

Esequiel Gomez, Felipe Garcia-Ramirez, Gabriel Leyva-Valdez, Rene Ruiz, Amy Louise Cruz, Jonathan Garcia Valdivia, Ulices Venzor, Omar Abraham Marin-Berumen, Cesar Joel Chavez, and Demi Ida Maestas, 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
First Degree Burglary, § 18-4-202
Second Degree Burglary, § 18-4-203
Theft, § 18-4-401
Second Degree Arson § 18-4-103
Forgery § 18-5-102
Criminal Mischief § 18-4-501
Possession of a Controlled Substance § 18-18-403.5

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 below, including any lesser included offenses: Uncharged Acts of Racketeering A through K; and Count Three through Count Two Hundred One (with the exception of any counts alleging violations of Chop Shop, C.R.S. § 18-4-420 and Vehicular Eluding, C.R.S. § 18-9-116.5) 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 Uncharged Acts of Racketeering and Counts, incorporated by reference herein.