

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

THE PEOPLE OF THE STATE OF COLORADO,

v.

ULICES VENZOR, DOB 4/16/93

RENE RUIZ, DOB 11/18/99

CARLOS SOTELO, DOB 8/6/86

DAVID NAVA-DELGADO, DOB 01/22/1997

CESAR CHAVEZ, DOB 07/02/98

HUGO MARTINEZ, DOB 01/14/77

PHILLIP ANGEL BASQUEZ, DOB 11/02/88

OMAR MARIN-BERUMEN, DOB 10/19/80

GABINO DETORRE, DOB 02/24/98

FABIAN VARELA-CASTILLO, DOB 12/16/93

ADAN LOPEZ-PACHECO, DOB 06/18/1998

OSCAR CHAVEZ, DOB 09/13/96

Defendants.

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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; §§ 18-17-104(4) AND 18-17-
104(3), C.R.S. [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 FIRST DEGREE CRIMINAL TRESPASS - AUTOMOBILE, C.R.S. 18-4-502 [F5] **09023**

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

COUNT NINE ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] **0804GA**

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

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	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 EIGHTEEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT NINETEEN	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT TWENTY	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT TWENTY-ONE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT TWENTY-TWO	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT TWENTY-THREE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT TWENTY-FOUR	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
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	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E

COUNT 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 TWENTY-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 THIRTY	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-ONE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT THIRTY-TWO	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] ATT 0804D
COUNT THIRTY-THREE	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A); 18-2-101 [F6] ATT 0804G
COUNT THIRTY-FOUR	CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4-501(1),(4)(D) [F6] 0901J
COUNT THIRTY-FIVE	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT THIRTY-SIX	ATTEMPTED AGGRAVATED ROBBERY MENACE VICTIM WITH WEAPON, C.R.S. 18-4-302(1)(b) [F4] 07023A
COUNT THIRTY-SEVEN	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(a) [F6] 0804GA
COUNT THIRTY-EIGHT	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT THIRTY-NINE	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT FORTY	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137

COUNT FORTY-ONE	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT FORTY-TWO	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A); 18-2-101 [F6] ATT 0804G
COUNT FORTY-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 FORTY-FOUR	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5- 104(1),(2)(B) [F5] 74137
COUNT FORTY-FIVE	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT FORTY-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 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	ASSAULT IN THE SECOND DEGREE - DEADLY WEAPON, C.R.S. 18-3-203(1)(B) [F4] 0202L
COUNT FORTY-NINE	ROBBERY, C.R.S. 18-4-301(1) [F4] 07011
COUNT FIFTY	CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4- 501(1),(4)(D) [F6] 0901J
COUNT FIFTY-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 FIFTY-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 FIFTY-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 FIFTY-FOUR	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT FIFTY-FIVE	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT FIFTY-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 FIFTY-SEVEN	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT FIFTY-EIGHT	VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT FIFTY-NINE	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] 0804GA
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	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] 0804GA
COUNT SIXTY-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 SIXTY-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 SIXTY-FOUR	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT SIXTY-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 SIXTY-SIX	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(a) [F6] 0804GA

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	IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-902(1)(A) [F4] 1307G
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	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000. C.R.S. 18-4-409(2).(3)(A) [F6] 0804GA
COUNT SEVENTY-ONE	THEFT OF AUTO PARTS - \$1,000 - \$20,000. C.R.S. 42-5-104(1).(2)(B) [F5] 74137
COUNT SEVENTY-TWO	THEFT OF AUTO PARTS - \$1,000 - \$20,000. C.R.S. 42-5-104(1).(2)(B) [F5] 74137
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	FIRST DEGREE CRIMINAL TRESPASS - AUTOMOBILE, C.R.S. 18-4-502 [F5] 09023
COUNT SEVENTY-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 SEVENTY-SIX	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1).(2)(f) [F6] 08A13
COUNT SEVENTY-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 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	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	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT EIGHTY-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 EIGHTY-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 EIGHTY-THREE	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
COUNT EIGHTY-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 EIGHTY-FIVE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT EIGHTY-SIX	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT EIGHTY-SEVEN	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT EIGHTY-EIGHT	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT EIGHTY-NINE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY-ONE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY-TWO	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14

COUNT NINETY-THREE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY-FOUR	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY-FIVE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT NINETY-SIX	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT NINETY-SEVEN	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT 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 NINETY-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 ONE HUNDRED	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] ATT 0804GA
COUNT ONE HUNDRED ONE	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] ATT 0804GA
COUNT ONE HUNDRED TWO	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] ATT 0804GA
COUNT ONE HUNDRED THREE	FIRST DEGREE CRIMINAL TRESPASS - AUTOMOBILE, C.R.S. 18-4-502 [F5] 09023
COUNT ONE HUNDRED FOUR	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
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	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT ONE HUNDRED SEVEN	CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4-501(1),(4)(D) [F6] 0901J
COUNT ONE HUNDRED 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 NINE	VEHICULAR FLUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT ONE HUNDRED TEN	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT ONE HUNDRED 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 ONE HUNDRED 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 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	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] ATT 0804GA
COUNT ONE HUNDRED FIFTEEN	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
COUNT ONE HUNDRED SIXTEEN	MENACING - REAL OR SIMULATED WEAPON, C.R.S. 18-3-206(1)(A)^(B) [F5] 02053
COUNT ONE HUNDRED SEVENTEEN	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 EIGHTEEN	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 NINETEEN	CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4-501(1),(4)(D) [F6] 0901J
COUNT ONE HUNDRED TWENTY	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A); 18-2-101 [F6] ATT 0804G
COUNT ONE HUNDRED TWENTY-ONE	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A); 18-2-101 [F6] ATT 0804G
COUNT ONE HUNDRED TWENTY-TWO	FIRST DEGREE CRIMINAL TRESPASS - AUTOMOBILE, C.R.S. 18-4-502 [F5] 09023
COUNT ONE HUNDRED 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 ONE HUNDRED 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 ONE HUNDRED 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 ONE HUNDRED TWENTY-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 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	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	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	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-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 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	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
COUNT ONE HUNDRED THIRTY-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 THIRTY-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 THIRTY-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 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	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT ONE HUNDRED FORTY	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT ONE HUNDRED FORTY-ONE	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 FORTY-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 FORTY-THREE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT ONE HUNDRED FORTY-FOUR	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13
COUNT ONE HUNDRED FORTY-FIVE	FIRST DEGREE CRIMINAL TRESPASS, C.R.S. 18-4-502 [F5] 09023
COUNT ONE HUNDRED FORTY-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 ONE HUNDRED FORTY-SEVEN	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(f) [F6] 08A13
COUNT ONE HUNDRED FORTY-EIGHT	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 FORTY-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 FIFTY	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 FIFTY-ONE	ATTEMPTED THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F6] 74137A
COUNT ONE HUNDRED FIFTY-TWO	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT ONE HUNDRED 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 ONE HUNDRED FIFTY-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 FIFTY-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 FIFTY-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 FIFTY-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 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 ONE HUNDRED FIFTY-NINE	ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$20,000 OR MORE, C.R.S. 18-4-409(4)(A) [F6] 0804DA
COUNT ONE HUNDRED SIXTY	VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT ONE HUNDRED SIXTY-ONE	VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
COUNT ONE HUNDRED SIXTY-TWO	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT ONE HUNDRED SIXTY-THREE	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
COUNT ONE HUNDRED SIXTY-FOUR	THEFT OF AUTO PARTS - \$1,000 - \$20,000, C.R.S. 42-5-104(1),(2)(B) [F5] 74137
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 FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
COUNT ONE HUNDRED SIXTY-SEVEN	THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A13

COUNT ONE HUNDRED SIXTY-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 SIXTY-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 SEVENTY	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-ONE	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 SEVENTY-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 SEVENTY-THREE	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT ONE HUNDRED SEVENTY-FOUR	AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000, C.R.S. 18-4-409(4)(B) [F6] 0804E
COUNT ONE HUNDRED SEVENTY-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 SEVENTY-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 SEVENTY-SEVEN	SECOND DEGREE BURGLARY - BUILDING, C.R.S. 18-4-203(1) [F4] 06031

DISTRICT COURT, CITY AND COUNTY OF DENVER,
COLORADO

1437 Bannock Street
Denver, CO 80202

THE PEOPLE OF THE STATE OF COLORADO.

v.

ULICES VENZOR, DOB 4/16/93

RENE RUIZ, DOB 11/18/99

CARLOS SOTELO, DOB 8/6/86

DAVID NAVA-DELGADO, DOB 01/22/1997

CESAR CHAVEZ, DOB 07/02/98

HUGO MARTINEZ, DOB 01/14/77

PHILLIP ANGEL BASQUEZ, DOB 11/02/88

OMAR MARIN-BERUMEN, DOB 10/19/80

GABINO DETORRE, DOB 02/24/98

FABIAN VARELA-CASTILLO, DOB 12/16/93

ADAN LOPEZ-PACHECO, DOB 06/18/1998

OSCAR CHAVEZ, DOB 09/13/96

Defendants.

PHILIP J. WEISER, Attorney General
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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 2023; 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
ULICES VENZOR	1-4, 8-29, 36-37, 40-96, 110-122, 124-138, 141-148, 150-159, 161, 164-177
RENE RUIZ	1-7, 17-25, 30-35, 63-64, 71, 73, 77, 81-96, 103-109, 112-113, 138-144, 156-159, 161
CARLOS SOTELO	1-2, 26-28, 38-65, 141-144
DAVID NAVA-DELGADO	1-2, 40-53, 110-113, 117, 120-122, 129-132, 138, 145-147, 148, 164-168
CESAR CHAVEZ	1-2, 97-109, 138-140, 148, 150-151, 156-160, 162-168, 170-177
HUGO MARTINEZ	1-2, 131, 142, 170
PHILLIP ANGEL BASQUEZ	1-2, 141-144, 153, 176
OMAR MARIN-BERUMEN	1-2, 149, 172
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FABIAN VARELA-CASTILLO	152
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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 October 11, 2020 and August 2, 2021, in the State of Colorado, **Ulices Venzor, Rene Ruiz, Carlos Sotelo, David Nava-Delgado, Cesar Chavez, Hugo Martinez, Phillip Angel Basquez, and Omar Marin-Berumen**, 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 October 11, 2020 and August 2, 2021, in the State of Colorado, **Ulices Venzor, Rene Ruiz, Carlos Sotelo, David Nava-Delgado, Cesar Chavez, Hugo Martinez, Phillip Angel Basquez, and Omar Marin-Berumen**, 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: **Ulices Venzor, Rene Ruiz, Carlos Sotelo, David Nava-Delgado, Cesar Chavez, Hugo Martinez, Phillip Angel Basquez, Omar Marin-Berumen, Gabino Detorre, Fabian Varela-Castillo, Adan Lopez-Pacheco, Oscar Chavez, Jaime Herrera, Gabriela Mosqueda, Jonathan Medina-Alvarez, Edith Cervantes Martinez,** 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. The activities of the enterprise focused generally around three categories of offenses and ancillary illicit activity: thefts of catalytic converters, thefts of motor vehicles from private parties, and thefts of motor vehicles from commercial dealerships.

With respect to the catalytic converter thefts, the members of the enterprise almost exclusively targeted Honda Element crossover vehicles and were proficient in quickly removing the motor vehicle part from the underside of a vehicle with an electric cutting tool, *e.g.* a Sawzall. The members of the enterprise employed a similar *modus operandi* in completing these types of thefts. Working in small groups or alone, the members would concentrate their activity to a specific geographic area, frequently stealing catalytic converters from several vehicles in one neighborhood in a short time frame during the overnight or early morning hours. Members frequently used a stolen vehicle to transport themselves to the areas of the thefts, sometimes travelling to cities far removed from their areas of residence, *e.g.* travelling from the Denver area to the Fort Collins area or the Summit County area. Catalytic converters from multiple vehicles would be cut or removed in quick succession by one member of the enterprise while another member drove the transport/stolen vehicle. Multiple detached catalytic converters would then be shared or distributed amongst the group, or sold to a third party for profit.

With respect to motor vehicles stolen from private parties, the members of the enterprise typically focused on full-size pick-up trucks and were proficient in quickly and forcibly entering vehicles by damaging the door locks and defeating the ignition mechanisms, resulting in a consistent pattern of damages observed in numerous recovered vehicles. Investigators familiar with motor vehicle thefts and these types of damages and repairs are aware that such damage to doors and ignition frequently exceed five hundred dollars. (*See* Grand Jury Exhibit 8, slides 21-22; Grand Jury Transcript, February 23, 2023, pages 68-70.) Again, working in small groups or alone, members used stolen vehicles to transport themselves to the location of another motor vehicle theft, or catalytic converter thefts as described above, resulting in a repeating "relay-style" pattern of activity whereby a vehicle would be stolen then abandoned at secondary location, and another vehicle stolen near the abandonment location. For example, on September 25, 2021, Ruiz instructed Chavez that it would be a mistake to go out to steal catalytic converters without also stealing vehicles. (*See* Grand Jury Exhibit 16, slide 44; Grand Jury Transcript, May 18, 2023, pages 39-40.) Using stolen vehicles as transportation during the commission of other offenses also served the enterprise's purpose of evading detection and concealing their identities. Recovered stolen vehicles reflected the members' attempts to disguise or alter the vehicles' appearance to further evade apprehension, including painting vehicles or vehicle parts such as trim and wheels, removing decals or stickers, and displaying fictitious license plates or temporary tags.

Members also stole the contents of vehicles stolen from private parties, including tools, equipment, and financial devices. Members quickly used stolen financial devices to make, or attempt to make, unauthorized purchases. The personal property stolen from vehicles appeared to be stockpiled in storage units by certain members, consistent with being sold to third parties for profit, or traded amongst the group. Members sold, shared, distributed, and used stolen vehicles amongst themselves. While some stolen vehicles were offered to third parties for sale and the proceeds distributed between the members who participated in the episode, some vehicles were kept and used as personal vehicles for an extended period of time. Members used digital devices, including text messages, pin drops, and photographs, to document the location of

the abandonment of vehicles and shared same amongst themselves. Members frequently returned to the location of the abandonment of a stolen vehicle, occasionally discovering that the vehicle had already been recovered by law enforcement. (See e.g. Grand Jury Exhibit 14, slide 55; Grand Jury Exhibit, slide 109.)

With respect to thefts of motor vehicles from commercial or retail locations, members frequently victimized the same dealerships on repeated occasions, stealing multiple vehicles during a single episode. Dealership thefts occurred during the overnight or early morning hours when the dealerships were not open for business. Members gained access to the dealership vehicles by cutting the lockboxes that contained the vehicle keys, or in one instance, burglarized the dealership's office and stole the vehicle keys. Stolen vehicles were then "staged" in locations nearby, and transported away from the area by multiple members of the enterprise making repeated round trips to and from the abandonment locations. Stolen retail vehicles also were shared or used by the members, or sold or transferred to other members for ultimate sale to third parties and proceeds serving as profit.

During all times relevant to this indictment, the members of the enterprise maintained a high level of frequent and on-going communications. Members used a variety of digital methods to communicate, including but not limited to social media platforms, such as Facebook, text messages, cellular communications and devices, app-based messaging platforms, and Google services and accounts. Significant portions of the communications revealed interpersonal relationships between the members indicative of predating the enterprise. As part of their scheme, members exchanged photos, videos, and location data with each other describing or "scouting" target vehicles or locations, and/or stolen vehicle descriptions and locations, and generally engaged in communications for the purpose of planning thefts or distributing stolen vehicles and property. The communications also revealed a hierarchy within the enterprise, with Venzor situated at the top. Venzor was the single member of the enterprise consistently involved in many of its activities. His communications reflect giving instructions to other members, inviting others to participate, and serving as a primary connection to the members of the enterprise who served in the role of "fences," namely, Marin-Berumen and Martinez. Neither of these individuals appeared to have directly participated in thefts but took possession of stolen vehicles and possibly catalytic converters, for subsequent distribution or sale. Members such as Venzor, Marin-Berumen, and/or Martinez may have also instructed or suggested types of vehicles to steal to other members.

The purpose of the enterprise was to maintain their lifestyle and their continued ability to commit illicit activities. Members continued to commit crimes to support themselves and their lifestyle, even when one or more members were caught and briefly jailed. After being released, members frequently and almost immediately returned to committing more crimes to support themselves.

Members of the enterprise working in concert with each other and/or with persons known and unknown to the Grand Jury, stole at least twenty-six catalytic converters from Honda

Elements during the timeframe relevant to this indictment. Given an approximate value ranging from \$2,000 to \$3,000 for each catalytic converter, the aggregate value of those stolen catalytic converters was \$52,000 to \$78,000.

Members of the enterprise working in concert with each other and/or with persons known and unknown to the Grand Jury trespassed, attempted to steal, or stole 167 vehicles during the time frame relevant to this indictment, with the aggregate value of those vehicles was impacted was approximately \$3,001,000.

PATTERN OF RACKETEERING ACTIVITY

Ulices Venzor, Rene Ruiz, Carlos Sotelo, David Nava-Delgado, Cesar Chavez, Hugo Martinez, Phillip Angel Basquez, and Omar Marin-Berumen, 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

Identity Theft, § 18-5-902

Second Degree Burglary, § 18-4-203

Theft, § 18-4-401

Menacing, § 18-3-206

Second Degree Assault, § 18-3-203

Robbery, § 18-4-301

Criminal Mischief, § 18-4-501

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 II; and Count Three through Count One Hundred Seventy-Seven (with the exception of any counts alleging violations of First Degree Criminal Trespass – Automobile, C.R.S. § 18-4-502, Theft of Auto Parts, C.R.S. § 42-5-104, 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.

UNCHARGED ACT OF RACKETEERING A
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Investigator Soole, Grand Jury Exhibit 5, Slides 3-13)

Between and including October 11, 2020 and October 13, 2020, in the State of Colorado, **Ulices Venzor** and **Rene Ruiz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Steven Morris, 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 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.

UNCHARGED ACT OF RACKETEERING B
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Investigator Soole, Grand Jury Exhibit 5, Slides 3-13)

On or about October 11, 2020, in the State of Colorado, **Ulices Venzor** and **Rene Ruiz**, in the State of Colorado, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of L.C. O'Neal, without authorization, or by threat or deception, 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 less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

UNCHARGED ACT OF RACKETEERING C
CRIMINAL MISCHIEF - \$1,000 - \$5,000, C.R.S. 18-4-501(1),(4)(D) [F6] 0901J
(Investigator Soole, Grand Jury Exhibit 5, Slides 3-13)

On or about October 11, 2020, in the State of Colorado, **Ulices Venzor** and **Rene Ruiz**, in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of L.C. O'Neal, the aggregate damage being one thousand dollars or more but less than five thousand dollars; in violation of section 18-4-501(1),(4)(d), C.R.S.

UNCHARGED ACT OF RACKETEERING D
MENACING - REAL OR SIMULATED WEAPON, C.R.S. 18-3-206(1)(A) (B) [F5] 02053
(Investigator Soole, Grand Jury Exhibit 5, Slides 3-13)

On or about October 11, 2020, in the State of Colorado, **Ulices Venzor** and **Rene Ruiz** by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place L.C. O'Neal in fear of imminent serious bodily injury by use of a deadly weapon or any

article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: a firearm; in violation of section 18-3-206(1)(a)/(b), C.R.S.

The material facts in support of Uncharged Acts of Racketeering A through D are set forth below in support of Counts Three and Four and are incorporated by reference herein.

The People of the State of the Colorado substantively charged Ulices Venzor with offenses based on Uncharged Acts of Racketeering A through D in Boulder County Colorado, District Court Case Number 2021CR1170.

UNCHARGED ACT OF RACKETEERING E
ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS
THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] 0804GA
(Investigator Jambor, Grand Jury Exhibit 18, Slides 3-14)

On or about October 17, 2020, in the State of Colorado, by engaging in conduct constituting a substantial step toward the commission of aggravated motor vehicle theft in the first degree, **Ulices Venzor**, unlawfully, feloniously, and knowingly attempted to obtain or exercise control over the motor vehicle of Savana Meisner, without authorization, or by threat or deception, 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 attempting to obtain control over or in the exercise of control of 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.

UNCHARGED ACT OF RACKETEERING F
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Investigator Jambor, Grand Jury Exhibit 18, Slides 3-14)

Between and including October 16, 2020 and October 22, 2020, in the State of Colorado, **Ulices Venzor**, in the State of Colorado, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Timothy Parker, without authorization, or by threat or deception, 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 less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

UNCHARGED ACT OF RACKETEERING G
ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS
THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] 0804GA
(Investigator Jambor, Grand Jury Exhibit 18, Slides 3-14)

On or about October 17, 2020, in the State of Colorado, by engaging in conduct constituting a substantial step toward the commission of aggravated motor vehicle theft in the first degree, **Ulices Venzor**, unlawfully, feloniously, and knowingly attempted to obtain or exercise control over the motor vehicle of Mauricio Humberto Brera Gomez, without authorization, or by threat or deception, 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 attempting to obtain control over or in the exercise of control of 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.

UNCHARGED ACT OF RACKETEERING H
ATTEMPTED AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS
THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F6] 0804GA
(Investigator Jambor, Grand Jury Exhibit 18, Slides 3-14)

Between and including October 17, 2020 and October 18, 2020, in the State of Colorado, by engaging in conduct constituting a substantial step toward the commission of aggravated motor vehicle theft in the first degree, **Ulices Venzor**, unlawfully, feloniously, and knowingly attempted to obtain or exercise control over the motor vehicle of Benjamin Gruner, without authorization, or by threat or deception, 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 attempting to obtain control over or in the exercise of control of 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.

UNCHARGED ACT OF RACKETEERING I
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Investigator Jambor, Grand Jury Exhibit 18, Slides 3-14)

Between and including October 17, 2020 and October 22, 2020, in the State of Colorado, **Ulices Venzor**, in the State of Colorado, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Larry Klebig, without authorization, or by threat or deception, 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 less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The material facts in support of Uncharged Acts of Racketeering E through I are as follows:

On or about October 17, 2020, Savana Meisner reported that a suspect had attempted to steal her black 2002 Cadillac Escalade, VIN 1GYEK63N12R155319, valued at \$7,000.00, while it was parked at 4708 Meadow Drive, Vail, Eagle County, Colorado. Meisner had parked her vehicle at that location on October 15, 2020, and when she returned to the vehicle on October 17, 2020 she noticed severe damage to the steering column and ignition. The estimated value of the damages was \$1000.00. Meisner reported that she heard noises outside of her apartment at approximately 4:00 a.m. on October 17, 2020, but assumed the noises were a bear and did not investigate any further.

On October 19, 2020, Timothy Parker reported that his black 2003 Chevrolet Silverado, VIN IGCEK14T53Z352033, valued at \$12,000, had been stolen from its parked location at 3901 Bighorn Road, Vail, Eagle County, Colorado. This location is approximately one mile from the location of Meisner's residence at 4708 Meadow Drive. Parker estimated that the theft occurred between October 16, 2020 and October 18, 2020 based on when he left the vehicle at that location. Officers recovered Parker's vehicle on October 22, 2020 at approximately 12:00 p.m. on Interstate 70 in Idaho Springs, Clear Creek County, Colorado. At the time of the recovery, Parker's vehicle was extensively damaged and inoperable. The vehicle had severe damage to its right front side, including the tire and wheel area. The driver's side door lock had been "punched" and damaged, and the steering column and ignition wiring had been tampered with. Parker also reported several personal items were missing from the vehicle including a snowplow controller and the vehicle's stereo.

On or about October 17, 2020, Mauricio Humberto Brera Gomez reported that a suspect attempted to steal his 2007 Hummer H2 SUV, VIN 5GRGN23U87H102764, valued at \$17,300.00, while it was parked in a parking structure at 241 S. Frontage Road E., Vail, Eagle County, Colorado (the Vail Village Parking Structure). Brera Gomez estimated that the attempted theft occurred between 9:00 a.m. and 6:00 p.m. based on when he left his vehicle parked at that location. When he returned to the vehicle at 6:00 p.m., Brera Gomez discovered the door lock and ignition had been damaged, with an estimated value of \$2,000.00 worth of damage.

On October 21, 2020, Benjamin Gruner reported that a suspect had attempted to steal his green 2004 Yukon Denali SUV while it was parked in the same parking structure at 241 S. Frontage Road E., Vail, Eagle County, Colorado. Gruner estimated that the attempted theft occurred between 3:15 p.m. on October 17, 2020, and the evening of October 18, 2020. When he returned to the vehicle on October 18, 2020, he discovered the driver's door lock had been punched or damaged, as well as the steering column had been tampered with. The damage to Gruner's vehicle was valued at \$1,000.00.

Surveillance video from the Vail Village Parking Structure showed Parker's Chevrolet Silverado entering the garage on October 17, 2020, at approximately 10:38 a.m. The driver of Parker's vehicle at that time had facial features and an appearance similar to Venzor. Parker's vehicle exited the garage at 11:12 a.m.

On October 17, 2020, Larry Klebig reported that his green 1997 Dodge Ram truck, VIN 3B7HF13Y1VG772115, valued between \$3,000 and \$10,000, had been stolen from its parked location at the Best Western hotel at 200 Loren Lane, Eagle, Eagle County, Colorado. Klebig explained that he left his truck parked at that location on the morning of October 17, 2020, when he began his shift at the Best Western. When he returned that evening his truck was gone. Officers recovered Klebig's truck on October 22, 2020 at 5 Murray Road, Edwards, Eagle County, Colorado. At the time of recovery, officers noted that the driver's door lock and ignition had been damaged and tampered with. The damage to Klebig's vehicle was valued at \$300 to \$1000. Investigators familiar with these types of offenses are aware that repairs for this kind of damage frequently exceed \$500.00 for replacement costs and repairs to the steering housing and ignition cylinders alone.

Surveillance video from the Murray Road location captured Klebig's vehicle being abandoned at that lot on October 17, 2020, at approximately 6:35 p.m. The surveillance video showed Venzor in the Murray Road lot walking away from a vehicle that appeared consistent with Timothy Parker's previously stolen Chevrolet Silverado, as well as standing at the back of Klebig's Dodge Ram truck. Parker reviewed the surveillance video and identified his vehicle as present in that location on October 17, 2020. An unidentified associate appears with Venzor in surveillance video. (See Grand Jury Transcript, June 8, 2023, pages 39-44.)

The People of the State of the Colorado substantively charged Ulices Venzor with offenses based on Uncharged Acts of Racketeering E through I in Eagle County Colorado, District Court Case Number 2021CR123.

UNCHARGED ACT OF RACKETEERING J

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

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

(Investigator Jambor, Grand Jury Exhibit 18, Slides 15-21)

On or about October 27, 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Mark Nelson, without authorization, or by threat or deception, 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 attempting to obtain control over or in the exercise of control of the motor vehicle, and/or used the motor vehicle in the commission of the crime of Identity Theft as set forth in section 18-5902, 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 K
IDENTITY THEFT - POSSESS WITH INTENT TO USE, C.R.S. 18-5-902(1)(B) [F4] 1307H
(Investigator Jambor, Grand Jury Exhibit 18, Slides 15-21)

On or about October 27, 2020, in the State of Colorado, **Ulices Venzor** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of Mark Nelson 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 material facts in support of Uncharged Acts of Racketeering J through K are as follows:

On or about October 27, 2020, Mark Nelson's silver 2006 Chevrolet Silverado 2500 truck, VIN 1GCHK23266F125631, valued at \$22,000, was stolen from its parked location at 1335 Westhaven Drive, Vail, Eagle County, Colorado. Nelson reported that he saw his vehicle driving away from his residence at approximately 8:20 a.m. on October 27, 2020. Nelson's truck was recovered a few hours later at 112 Fairgrounds Road, Eagle, Eagle County, Colorado. Upon recovery, officers noted damage to the door lock and ignition, and with an estimated \$3,487 worth of damage to the vehicle.

Following the theft of his vehicle, Nelson reported several unauthorized charges and attempted charges on his Wells Fargo debit card and American Express bank card from that same date. A suspect attempted a \$1,032.00 charge on Nelson's Wells Fargo debit card at Alpine Lumber in Eagle; however, the transaction was declined. Two completed charges were made at a Conoco gas station also in Eagle on Nelson's Wells Fargo debit card: one charge for \$35 worth of gas, and one charge for \$34 worth of diesel fuel. These two separate charges are consistent with the presence of multiple suspects in multiple vehicles needing different types of fuel. A suspect also attempted to charge \$937.50 on Nelson's Wells Fargo debit card at an Autozone in Gypsum; however, this transaction was declined. This charge was then successfully made using Nelson's American Express bank card.

Nelson's American Express bank card was again attempted to be used at a Smoker's World store in Northglenn, Adams County, on the evening of October 28, 2020. Surveillance video from the date and time of the transaction showed that the individual using Nelson's bank card at that time had a physical appearance consistent with Venzor. (*See Grand Jury Transcript, June 8, 2023, pages 44-48.*)

The People of the State of the Colorado substantively charged Ulices Venzor with offenses based on Uncharged Acts of Racketeering J through K in Eagle County Colorado. District Court Case Number 2021CR123.

UNCHARGED ACT OF RACKETEERING L
AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000,
C.R.S. 18-4-409(4)(B) [F6] 0804E

(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

On or about October 30 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Cynthia Dominguez-Pena, without authorization or by threat or deception, and the value of the motor vehicle was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-409(4)(b), C.R.S.

UNCHARGED ACT OF RACKETEERING M
AGGRAVATED MOTOR VEHICLE THEFT IN THE SECOND DEGREE - \$1,000-\$20,000,
C.R.S. 18-4-409(4)(B) [F6] 0804E

(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

On or about October 30, 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of John Freddy Rojas-Trujillo, without authorization, or by threat or deception, and the value of the motor vehicle was one thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-409(4)(b), C.R.S.

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

(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

Between and including October 30, 2020 and November 11, 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Maria Hernandez-Prieto, 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 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.

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

(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

On or about October 30, 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Samuel Rakoc, without authorization, or by threat or deception, and 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 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.

UNCHARGED ACT OF RACKETEERING P
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 0804G
(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

Between and including October 30, 2020 and November 11, 2020, in the State of Colorado, **Ulices Venzor**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Guadalupe Cordova, without authorization, or by threat or deception, and 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 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.

UNCHARGED ACT OF RACKETEERING Q
IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-
902(1)(A) [F4] 1307G
(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

On or about October 30, 2020, in the State of Colorado, **Ulices Venzor** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Nicholas Sealy 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.

UNCHARGED ACT OF RACKETEERING R
IDENTITY THEFT - USES INFORMATION TO OBTAIN THING OF VALUE, C.R.S. 18-5-
902(1)(A) [F4] 1307G
(Investigator Jambor, Grand Jury Exhibit 18, Slides 22-50)

On or about October 30, 2020, in the State of Colorado, **Ulices Venzor** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of Krista Scott 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.

The material facts in support of Uncharged Acts of Racketeering L through R are as follows:

On or about October 30, 2020, at 6:50 a.m., Cynthia Dominguez-Pena reported that her black 2005 BMW X3 SUV, VIN WBXPA934X5WD23027, valued at \$4,500.00, was stolen

from its parked location at 10 Stonebridge Drive, Building S, Unit 202, Avon, Eagle County, Colorado. At approximately 6:55 a.m. that morning, Dominguez-Pena observed a suspect driving her vehicle away from her residence. Dominguez-Pena explained that she had started her vehicle, and left it unlocked and running in front of her residence to warm up at that time. Officers later recovered Dominguez-Pena's vehicle at 210 Edwards Village Boulevard, Edwards, Eagle County, Colorado.

On or about October 30, 2020, at 7:03 a.m., John Freddy Rojas-Trujillo reported that his black 2010 Ford Edge SUV, VIN 2FMDK3GC3ABA04200, valued at \$4,438.00, was stolen from its parked location at 38609 U.S. Highway 6, Building U, Unit 202, Avon, Eagle County, Colorado. Significantly, this location is just down the street from the location of Dominguez-Pena's theft. Rojas-Trujillo explained that he had started his vehicle, and left it unlocked and running to warm up at that time. When he returned at approximately 7:00 a.m., the vehicle was gone. Officers later recovered Rojas-Trujillo's vehicle at the Grouse Creek Trailhead on Highway 24 in Minturn, Eagle County, Colorado—where multiple vehicles would be trespassed later this same date.

On or about October 30, 2020, at 8:17 a.m., Maria Hernandez-Prieto reported that her grey 2013 Volkswagen Jetta sedan, VIN 2VWDP7AJDM454675, valued at \$8,000.00, was stolen from its parked location at 38609 U.S. Highway 6, Building No. 126, Edwards, Eagle County, Colorado. This was the second motor vehicle theft to occur at this location in the same time frame with the same *modus operandi*. Hernandez-Prieto explained that she had started her vehicle, and left it unlocked and running to warm up at that time. Minutes later she returned, and observed her Jetta being driven away by a male driver and a black SUV driven by a female nearby. Investigators believed the male and female suspects were working in coordination based on Hernandez-Prieto's description of the involvement of the black SUV. Officers recovered Hernandez-Prieto's gray 2013 Volkswagen Jetta on or about November 11, 2020, in Adams County, Colorado.

On or about October 30, 2020, at 8:47 a.m., Samuel Rakoc reported that his purple 2015 Subaru Outback wagon, VIN 4S4BSELC9F3230578, valued at \$13,275.00, was stolen from his residence at 1060 W. Beaver Creek Boulevard, Unit C102, Avon, Eagle County, Colorado. Rakoc explained that he had started his vehicle, and left it unlocked and running to warm up at that time. When he returned minutes later, the vehicle was gone. Rakoc reported that he had the key fob for the vehicle on him at the time of the theft. Officers later recovered Rakoc's vehicle at 901 W. Beaver Creek Boulevard, Number 45, Avon, Eagle County, Colorado.

On or about October 30, 2020, at 9:10 a.m., Guadalupe Cordova reported that her black 2016 Nissan Pathfinder SUV, VIN 5N1AR2MM9GC618215, valued at \$18,000.00, was stolen from its parked location at 901 W. Beaver Creek Boulevard, Number 45, Avon, Eagle County, Colorado (the Aspens Trailer Park). Cordova explained that she had started her vehicle, and left it unlocked and running. Residential surveillance video captured the theft of Cordova's vehicle. At approximately 8:45 a.m., the video showed a purple or blue Subaru wagon consistent with