

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>Chelsea HALL-CHAVIRA Juan MENDOZA</p> <p>Defendant.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General CHRISTINA DONAHUE, Reg. No. 55817* Senior Assistant Attorney General JOHN STOCKLEY, Reg. No. 52496* Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 720-508-6000 *Counsel of Record</p>	<p>Case No.:</p> <p>Grand Jury Case No.:</p> <p>24CR0001</p> <p>Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2024-2025 term of the Denver District Court in the year 2025; the 2024-2025 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:

COUNT 1	Possession with Intent to Distribute a Controlled Substance – Fentanyl – over 50 grams, C.R.S. §18-18-405(1),(2)(a)(I)(D), (DF1) 87123
COUNT 2	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7-112 grams, C.R.S. 18-18-405(1),(2)(b)(I)(B), (DF2) 8104A
COUNT 3	Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B), (DF1) 8104B
COUNT 4	Conspiracy to Distribute a Controlled Substance – Heroin – 7-112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2) 8105N
COUNT 5	Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7-112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2) 8105N
COUNT 6	Conspiracy to Distribute a Controlled Substance – Fentanyl – 4-50 grams, 18-18-405(1),(2)(b)(I)(D), (DF2) 87134
COUNT 7	Conspiracy to Distribute a Controlled Substance – Heroin – 7-112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2) 8105N

INDEX OF DEFENDANTS

Defendant:	Counts:
Chelsea HALL-CHAVIRA	1-7
Juan MENDOZA	4-5

COUNT 1

**Possession with Intent to Distribute a Controlled Substance – Fentanyl – over 50 grams,
C.R.S. §18-18-405(1),(2)(a)(I)(D), (DF1)
87123**

On or about February 27, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section 18-18-405(1),(2)(a)(I)(D), C.R.S.

COUNT 2

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7-112
grams, C.R.S. 18-18-405(1),(2)(b)(I)(B), (DF2)
8104A**

On or about February 27, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The offenses in counts 1-2 were committed in the following manner:

On February 27, 2024, investigators initiated a traffic stop in Trinidad, Colorado, on a Lincoln Town Car that was being driven by Chelsea Hall-Chavira. After a positive K-9 alert, investigators searched the vehicle and located approximately 10.98 kilograms of counterfeit M/30 pills containing fentanyl and 33 grams of methamphetamine. On scene, Hall-Chavira took ownership of the narcotics in the vehicle and stated she was taking them to Denver. The next day, Hall-Chavira participated in a voluntary interview with investigators at the DEA Colorado Springs Resident Office, and she stated she started transporting illegal drugs around 10 years ago and that she sells the narcotics locally in Lamar, Colorado, were she was living during this investigation.

COUNT 3

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B), (DF1)
8104B**

On or about April 18, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The offense in count 3 was committed in the following manner:

On April 18, 2024, investigators observed, through GPS surveillance, that Hall-Chavira's vehicle was located in Denver, Colorado. Investigators initiated surveillance in the area of 1455 Tennyson Street, Denver, Colorado and observed Chelsea Hall-Chavira leave the residence carrying several bags. She got into her green Lincoln Town Car and travelled southbound. Officers initiated a traffic stop on the vehicle driven by Chelsea Hall-Chavira in Colorado Springs, Colorado. During the traffic stop, officers located approximately 494.2 grams of methamphetamine inside the trunk of the vehicle.

COUNT 4

**Conspiracy to Distribute a Controlled Substance – Heroin – 7-112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2)
8105N**

On or about and between August 26, 2024, and August 27, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA and Juan MENDOZA**, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 5

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7-112 grams,
C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2)
8105N**

On or about and between August 26, 2024, and August 27, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA and Juan MENDOZA**, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The offenses in counts 4-5 were committed in the following manner:

On August 26, 2024, Hall-Chavira was intercepted speaking to Juan Mendoza about traveling to Pueblo, Colorado to acquire methamphetamine and heroin. During this intercepted call, Hall-Chavira's phone was pinging in Lamar, Colorado. Hall-Chavira was later surveilled traveling from Lamar, Colorado to Pueblo but she did not meet with Mendoza that day. On August 27, 2024, investigators observed Hall-Chavira meet twice with Mendoza. The first meeting occurred at 600 Gary Avenue, Pueblo, Colorado. Following the first meeting, Hall-Chavira was intercepted speaking to Mendoza at approximately 10:38 pm. Hall-Chavira discussed needing to acquire more money and needing to get "water," code for methamphetamine. Hall-Chavira travelled to an ATM and investigators later observed her meet with Mendoza again at 108 Baxter Road, Pueblo, Colorado. Based on the content of the intercepted communications and training and experience, investigators believe the deal was for 3 ounces of heroin and 3 ounces of methamphetamine.

COUNT 6

**Conspiracy to Distribute a Controlled Substance – Fentanyl – 4-50 grams, 18-18-
405(1),(2)(b)(I)(D), (DF2)
87134**

On or about September 11, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA** and others known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The offense in count 6 was committed in the following manner:

On September 11, 2024, Hall-Chavira was intercepted communicating with John Nunnery regarding the distribution of between 260-400 pills containing fentanyl (approximately 26 – 40 grams). On that day, John Nunnery contacted Hall-Chavira and the two talk about the quality and price of the narcotics. Nunnery also inquired if the price included delivery. Hall-Chavira agreed to meet Nunnery in Dumont, Colorado. Investigators on surveillance followed Hall-Chavira to 1039 County Road, #308, Dumont, Colorado and observed a vehicle registered to Nunnery’s mother park next to Hall-Chavira’s vehicle. Hall-Chavira entered Nunnery’s vehicle. After both parties departed, Hall-Chavira texted “erase messages.”

COUNT 7

**Conspiracy to Distribute a Controlled Substance – Heroin – 7-112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B), (DF2)
8105N**

On or about October 7, 2024, in the State of Colorado, **Chelsea HALL-CHAVIRA**, and others known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The offense in count 7 was committed in the following manner:

On the morning of October 7, 2024, Joshua Hyatt was intercepted discussing with Chelsea Hall-Chavira that a customer named Charles Nunnery had ordered narcotics. Hyatt informed Hall-Chavira that he had 1 for Nunnery, meaning 1 ounce or approximately 28 grams of heroin. Hyatt and Hall-Chavira discussed selling the ounce of heroin to Nunnery. Later that day, Nunnery called Hyatt and discussed meeting at exit 108 off of I-25 north of Pueblo, Colorado. Investigators observed Hyatt meet with Charles Nunnery to complete the transaction. After this transaction took place, Hyatt called Hall-Chavira to inform that Nunnery did not have the full amount of money for the transaction, but that Nunnery would later pay the remaining balance for the ounce of heroin. During this intercepted call, Hall-Chavira’s phone was pinging in Lamar, Colorado.

PHILIP J. WEISER
ATTORNEY GENERAL
STATE OF COLORADO

CDL

CHRISTINA DONAHUE #55817
Senior Assistant Attorney General
Special Prosecution Unit
Criminal Justice Section

Subscribed and sworn to before me in the City and County of Denver, State of Colorado, this 9th day of January, 2025.

CLAUDIA BOOTON
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19964020260
MY COMMISSION EXPIRES AUGUST 30, 2028

[Signature]

NOTARY PUBLIC

S E A L

My commission expires: 8/30/28

The 2024-2025 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 9th day of January, 2025.

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

[Signature]
Christopher J. Baumann
Chief Judge
Second Judicial District
Chief Judge Christopher Baumann
Presiding Judge, State Grand Jury